



December 21, 2009

California Transmission Planning Group

This letter was submitted online at www.ctpg.us

RE: California Transmission Planning Group (“CTPG”) Comments on Draft Study Plan and December 17th, 2009 Stakeholder Meeting

Dear CTPG Members:

I am writing on behalf of the Large-scale Solar Association¹ (“LSA”) in response to the CTPG’s public workshop on December 17th, 2009. LSA offers the following brief comments on the CTPG’s planning process. Attached to this letter, you will find LSA’s comments on the CAISO’s Proposal for a 33% Renewable Energy Transmission Planning Process (“RETTP”).² Among the issues addressed in LSA’s RETTP comments, LSA urges the CAISO to: (1) expeditiously approve RETI foundation group transmission projects and feeder lines; (2) account for regional and interstate transmission needs early in the planning process; and (3) ensure that the CTPG undertakes an open and transparent planning process. This letter stresses the latter two points, but LSA urges the CTPG to consider the attached comments.

LSA is concerned about the openness and transparency of the CTPG process. As stated in our comments to the CAISO, “LSA could support the development of a draft plan through the CTPG, so long as the process is open and transparent. A key attribute of the CTPG is its inclusion of municipal utilities, whose involvement is critical to a complete transmission plan. However, other stakeholders must be involved early in the process as well.” To date, broader stakeholder involvement has not materialized, which is evidenced in part by the abbreviated comment period for these comments. Until the December 17th workshop, public stakeholders were neither aware of the August 11th workshop, nor

¹ LSA represents twelve of the nation’s largest developers and providers of utility-scale solar generating resources. Collectively, LSA’s members have contracted to provide over 6 gigawatts (“GW”) of clean, sustainable solar power under contract to California’s load-serving entities (“LSEs”). Its members develop, own and operate various types of utility-scale solar technologies, including photovoltaic and solar thermal system designs. LSA, and its individual member companies, are leaders in the renewable energy industry, advancing solar generation technologies and advocating competitive market structures that facilitate significant integration of renewable energy throughout the western United States. LSA represents the interests of utility-scale solar development in California, Arizona, and Nevada, and also works to shape regional and federal policies that affect solar development.

² LSA submitted comments on the first two iterations of the CAISO proposal. LSA’s comments are attached to this letter and are also available online. Comments submitted on the first staff proposal are available at: <http://www.aiso.com/243a/243a92434bd30.pdf>; Comments submitted on the second staff proposal are available at: <http://www.aiso.com/2465/2465ea185e330.pdf>

the current comment period. The December 21st deadline for the current comment period does not provide adequate opportunity to provide substantive feedback on some of the most important issues: the scope, input and assumptions of the CTPG plan. To provide for greater transparency and openness, LSA recommends including two non-utility stakeholders on the CTPG executive committee and providing for longer and more adequate comment periods *after* the workshops.

Meaningful stakeholder involvement is critical for two reasons: (1) compliance with federal requirements for openness and transparency; and (2) to create a plan that is feasible and minimizes the risk of stranded assets. Achievement of this latter objective is questionable given comments of CTPG members at the December 17th workshop the CTPG would only revise the study results when there is a fatal flaw, but not when there is a better way to conduct the study. Moreover, if the CTPG only produces one study plan, and does not incorporate a scenario based approach, the CTPG should account for stakeholder input beyond simply making changes when there is a fatal flaw. This is especially important with respect to the creation of generation development assumptions. The December 17th workshop provided some insights as to how the CTPG is analyzing generation dispatch and CREZ development, but it is still unclear how the CTPG is utilizing the results from RETI.

To resolve these uncertainties and provide for a more accurate and feasible transmission plan, LSA urges the CTPG to bolster its stakeholder input process. In addition to including two non-utility members on the executive committee, the CTPG should also host another workshop focusing exclusively on generation assumptions before it releases the draft results report. As mentioned above, LSA also urges the CTPG to consider LSA's comments to the CAISO, which address the scope and objectives of the CTPG process.

The creation of an accurate and feasible transmission plan will also be limited by the California-only focus of the CTPG's plan. The electric grid is not only interconnected throughout the west, but there are new demands for more coordinated interstate planning. To date, renewable generation developers have proposed a significant number of projects in neighboring states. An interregional planning approach will enhance both reliability and the capacity to integrate greater quantities of intermittent renewable energy and will promote compliance with Order 890. By creating a much wider footprint, LSEs could also meaningfully access not only "native" renewable generation, but also regional renewable generation. Doing so will maximize the value of clean power for California ratepayers, as well as ratepayers within the WECC. LSA therefore urges the CTPG to consider and plan for regional renewable development and encourage both the export and import of renewable power. The CTPG should also include utility representatives from nearby states on the CTPG executive committee.

If you have any questions or concerns or have difficulty opening the attachment (LSA comments to CAISO), please do not hesitate to contact me by email at shannon@consciousventuresgroup.com or by phone at (415) 819 4285. Thank you for your consideration.

Sincerely,

_____/s/
Shannon Eddy
Executive Director of the Large-scale Solar Association

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