

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



December 29, 2009

To: California Transmission Planning Group, Executive Committee

Re: Energy Commission Comments Concerning the CTPG Study Plan Approach

Dear Committee Members:

We appreciate the opportunity to provide comments on the California Transmission Planning Group's (CTPG) proposed statewide transmission study plan. We believe that the CTPG is a vital element to transmission planning in California. The California Energy Commission's *2009 Integrated Energy Policy Report* (IEPR) has clearly acknowledged the importance of the CTPG in planning for future transmission infrastructure in California. The California Independent System Operator's (California ISO) Renewable Energy Transmission Planning Process (RETPP) is relying on the CTPG for Phase 1 of its RETPP. It is therefore critical that the CTPG efforts are successful. The Energy Commission staff is interested in providing whatever support we can to help ensure success of the CTPG and offer these comments as part of our ongoing constructive input.

Success of the CTPG statewide transmission plan will ultimately be measured by how it influences formal transmission planning in California, and, if the transmission plan is implementable. In other words, will the high priority transmission infrastructure identified in the plan be permitted or not? In large part, this will depend on whether or not the CTPG (and subsequently the California ISO) secures broad stakeholder support early in the planning process and planning assumptions applied in the CTPG statewide transmission plan, California ISO RETPP, and California Public Utilities Commission Long-Term Procurement Plan process are aligned with those developed by the Energy Commission in the Integrated Energy Policy Report.

In our view, a typical review and comment approach as exemplified by the Federal Energy Regulatory Commission Order No. 890 requirements will not be adequate to secure the level of stakeholder support necessary to site and construct needed transmission infrastructure because stakeholders will not have a sense of ownership in the resulting transmission plan. In order to be viable, transmission projects must be developed in planning processes having as much transparency as possible, intensive stakeholder participation and collaboration, and early consideration of environmental and land use issues. The Renewable Energy Transmission Initiative (RETI) is the ideal forum to seek and secure broad stakeholder support. We strongly encourage the CTPG to establish a collaborative stakeholder process with the RETI organization and ultimately seek a partnership that will result in RETI and other stakeholder support for

the CTPG plan and for subsequent transmission infrastructure permitting and construction. If the collaborative approach is successful, the RETI and other stakeholders will likely feel ownership, and will likely prove invaluable to development of future transmission infrastructure in a timely manner, particularly for transmission infrastructure needed to meet California's renewable goals.

We wish you the best in your difficult task to create a proposed statewide transmission plan for due consideration in formal transmission planning and permitting processes in California. Please let us know if there is anything we can do to assist you in this effort. If you have any questions please contact Chuck Najarian of my staff at (916) 654-4079.

Sincerely,

Original signed by

MELISSA JONES
Executive Director