

**Response of the
California Transmission Planning Group Technical Steering Committee
To Comments of the
Large-Scale Solar Association**

January 15, 2009

The California Transmission Planning Group (CTPG) expresses its appreciation for the Comments of the Large-Scale Solar Association (“LSA”) regarding the CTPG’s Draft Study Plan as presented during the technical conference of December 17, 2009. The Technical Steering Committee is charged with the design and performance of the planning studies being performed by the CTPG and provides these responses to the LSA’s Comments. In addition to the responses provided here, the CTPG Technical Steering Committee advises the LSA Staff that many of the concerns and issues raised in the LSA’s Comments will be addressed more completely as the work of the Technical Steering Committee progresses. The responses provided below follow the organization of the Comments as submitted by the LSA.

**LSA’s comments on the California ISO’s Proposal for 33% Renewable Energy
Transmission Planning Process**

The purpose of CTPG is not to replace the transmission planning process of any of its members. Those processes will be integrated into the work of the CTPG and our planning process will be coordinated with those processes. Therefore, the CTPG Technical Steering Committee is not in a position to respond to your comments regarding issues addressing California ISO’s planning methodologies and processes, but will be coordinating their work (and to the extent your comments to the California ISO are reflected in their studies and plans) with ours. With regard to the transparency or openness of CTPG work activities, CTPG will conduct its planning activities in a manner consistent with the planning principles articulated in Order 890 as adopted by the Federal Energy Regulatory Commission. Presently, CTPG is in the process of developing an organizational framework and will be expanding its stakeholder processes to meet the requirements of Order 890, but more importantly to assure the robustness of our planning process and study results.

Generation Re-dispatch and Out-of-State Generation

The CTPG Technical Steering Committee will be addressing LSA’s recommendations regarding the generation re-dispatch methodology and assumptions related to out-of-state renewable generation at our upcoming (January 20th) stakeholder meeting. As suggested by LSA, we plan to discuss these issues in a greater detail and answer any questions you may have on these issues. Furthermore, we will be releasing more documentations and tools on the methodologies and processes used to accomplish these scenarios.

The CTPG Technical Steering Committee also fully agrees with LSA’s comments on the importance of out-of-state renewable development. As LSA recommends, the CTPG is

developing the manner in which it will coordinate its planning processes with other transmission planning processes conducted by entities other than those in California and with other subregional and regional planning groups. We recognize the importance of this coordination since, as was discussed at the December 17th meeting, the renewable net short energy forecast was developed based on the procurement plans of the load-serving entities and reflects a higher level of out-of-state generation compared to the RETI assumptions. As the work of the CTPG progresses, we will be developing processes and practices to assure coordination of CTPG's planning processes with utilities outside the State of California and with the WECC planning processes, the latter of which is itself undergoing significant revisions.