

Feedback

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Subject: CTPG Phase 2 Study Plan

Message: As noted in the recent CTPG Stakeholder meeting, the study only assesses the ability for the transmission system to support a 33% RPS goal in 2020 misses the important element that the path is as important as the destination. The current renewable transmission plan in both CTPG and RETPP is being driven by large transmission projects. These projects have long development times and large schedule risks. In fact, based on the current project proposals, the mega-projects are unlikely to be in service before 2018 (assumes 7 years for permitting, engineering, procurement & construction after CAISO approval next year). This leaves two years for all the renewable projects needed for a 2020 RPS goal that would utilize these facilities to construct. This is a physically impractical/impossible due to combined construction and financing requirements of all the simultaneous projects.

Therefore the study objective should be expanded include an annual roadmap of transmission capacity to be added to the system with milestones established for the interim years. This will bring an increased focus on those upgrades that can be implemented in the near term with lower risk.