

Division of Ratepayer Advocates, California Public Utilities Commission Comments  
2010 Phase 2 CTPG 2020 Study Plan  
Draft January 29, 2010

The Division of Ratepayer Advocates of the California Public Utilities Commission (DRA) appreciates the opportunity to further comment on the 2010 Phase 2 CTPG 2020 Study Plan Draft, issued on January 29, 2010. Initial comments were provided at the stakeholder meeting on February 2, 2010.

DRA has a statutory responsibility to advocate for the ratepayers of the State of California in order that they obtain the lowest possible rate for service consistent with reliable and safe service levels. Based on the results of the CTPG Draft Study Report, there could be a significant cost impact on these ratepayers due to transmission upgrades that are shown to be necessary by the study.

As mentioned at the Stakeholder meeting, DRA is very concerned that the 2010 Phase 2 CTPG Draft Study Plan was issued prior to receipt of and CTPG evaluation of Stakeholder comments on the 2010 Phase 1 CTPG Draft Study Report of January 29, 2010. DRA requested additional information on the schedule from Mr. Mohammed Beshir by e-mail on February 3, 2010 and has had not response.

As stated in Section 2.2, Scope, of the Draft Study Plan, “Each phase is intended to build on the previous phase by refining and adding additional scenarios and assumptions and testing the sensitivity of these scenarios and assumptions.” The Phase 1 Draft Study Report had assumptions that, in DRA’s opinion, are not in the best interest of the ratepayers of the state. Since February 8, 2010 is the final date for submission of comments on the Draft Study Report, DRA recommends a delay so that stakeholder comments can be included in the Draft Study Plan.

Because of this accelerated schedule, DRA believes the entire CTPG planning process is being brought into serious doubt. CTPG should re-assess the schedule for the draft Phase 2 Study Plan to include stakeholder comments and allow sufficient time for evaluation of these comments before issuance of a following phase document or documents.

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