



**Response of the California Transmission Planning Group
Technical Steering Committee Study Team**

**FirstSolar Comments
Re CTPG Draft Phase 2 Study Plan**

Comment Received:

As noted in the recent CTPG Stakeholder meeting, the study only assesses the ability for the transmission system to support achieving the 33-percent renewable portfolio standard goal in 2020 and misses the important element that the path is as important as the destination. The current renewable transmission plan in both CTPG and the California ISO's Renewable Energy Transmission Planning Process 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 (assuming seven years for permitting, engineering, procurement and construction after California ISO approval next year). This leaves two years for all the renewable projects needed for a 2020 RPS goal that would utilize these facilities to complete their development. 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.

CTPG Study Team Response:

While CTPG's initial work has been focused around meeting renewable resource goals for the year 2020, CTPG agrees with FirstSolar's suggestion that it would be useful to evaluate what can be done on the transmission side to facilitate renewable resource development in the interim period as well. This would involve identifying grid modifications that can accommodate renewable resource additions on a phased approach; modifications that can be done relatively quickly and easily. Due to time and resource constraints, however, CTPG's draft Phase 2 study plan is solely focused on year 2020 and does not at this time include work that would suggest how the identified grid modifications might be phased in over time. It is important to realize, however, that CTPG's study plan and planning process over the next several months are not intended to subsume or preclude the generation interconnection processes conducted by the planning authorities that participate in the CTPG. CTPG expects that these processes will address many of the smaller and lower risk projects needed to support renewable resource interconnection and deliverability. This will enable those projects to proceed faster than the major projects wherever feasible and in the public interest.