

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

**Z-Global Comments  
Re CTPG's draft Phase 2 Study Plan**

**Comment Received:**

The scenarios to be considered should take into account the fact that RETI did not do actual power flow studies. Therefore, the projects proposed as part of the several California ISO open windows should also be studied to properly determine which sets of transmission lines will deliver renewable energy at the most economic price.

**CTPG Study Team Response:**

With respect to the first observation, CTPG is conducting power flow analyses that provide the basis for its transmission planning. CTPG is building on the information developed in the RETI process by conducting contingency-based power flow analyses of renewable development scenarios assuming a variety of system conditions. These include summer peak load cases, "light load" spring cases, and conditions where specific path flows are modeled at pre-determined high levels. Where contingencies result in reliability criteria violations, CTPG identifies transmission infrastructure additions that mitigate those violations.

With respect to the second observation, that projects proposed in California ISO open windows should also be studied to determine the most economic transmission plan, CTPG notes that it is considering various renewable resource scenarios in its three phases and these scenarios could generate different transmission requirements, which could include those projects submitted through the ISO open windows. Whether or not proposed projects submitted through the California ISO request windows are evaluated by CTPG, they will be considered as part of the California ISO planning process following the development of a comprehensive transmission plan for the California ISO footprint at the end of 2010.

**Comment Received:**

The Green Path north project should be removed from all the studies.

**CTPG Study Team Response:**

CTPG's Phase 2 studies will not include the Green Path North project.

**Comment Received:**

CTPG should take into account the projects that are being proposed as part of the California ISO studies for the cluster windows.

### **CTPG Study Team Response:**

The California ISO's generation interconnection cluster studies use a specific study methodology and a unique set of system conditions to identify Delivery Network Upgrades that mitigate contingency-based reliability criteria violations. Because this methodology and assumed system conditions are generally much different than those used by the CTPG to identify reliability criteria violations, CTPG does not believe it is appropriate to simply assume that all of the Delivery Network Upgrades identified by the California ISO in its interconnection studies make sense from an overall statewide transmission planning perspective.<sup>1</sup> However, the Delivery Network Upgrades identified in the California ISO's interconnection studies will be used as possible candidates for mitigating reliability criteria violations identified in CTPG's Phase 2 studies.

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<sup>1</sup> For example, the California ISO's interconnection study methodology assumes that 100 percent of interconnecting generators within a cluster will (i) actually get built, and (ii) simultaneously be operating at or near full output along with all existing fossil-fired generation in the cluster area. CTPG's studies assume that renewable generation additions will not significantly exceed the amount required to meet California's 33-percent renewable resource goal, specifically account for the temporal diversity in renewable resource output, and reduce the output of fossil-fired generation on a economic merit-order basis.