

Comments of the California Energy Commission Staff on the 2010 California
Transmission Planning Group (CTPG) Revised Draft Study Plan for 2020: Phase 3
Dated April 13, 2010

Introduction

The Electricity Analysis Office (EAO) of the California Energy Commission (CEC) appreciates the opportunity to comment on the 2010 California Transmission Planning Group (CTPG) Revised Draft Study Plan for 2020: Phase 3 dated April 13, 2010 and discussed at a stakeholder meeting on April 20, 2010. CEC staff finds the quality and reporting of the research to be outstanding and support the CTPG analytical efforts regarding generation re-dispatch. Our comments address the following topics:

- 1. A scenario of retirements for the State's Once-Through Cooling (OTC) unit is not included in the Phase 3 Study Plan**
- 2. Proposed generation re-dispatch method**
- 3. Amount of existing eligible renewable energy in the GE Maps dataset**

Specific Comments

1. A scenario of retirements for the State's Once-Through Cooling (OTC) unit is not included in the Phase 3 Study Plan

The Phase 2 Study presentation indicates that OTC needs are independent of RPS. The CEC staff disagrees with this perspective since transmission and generation upgrades in support of OTC replacement strategies will likely result in fewer incremental transmission modifications needed to meet the 33 percent renewable goals. The Phase 2 OTC scenario simulation results showing bulk transmission needs and mitigation has the fewest necessary project additions identified of any scenario considered. OTC retirement/replacement will also result in power flow changes that need to be considered simultaneously with the addition of 33 percent renewable generation.

The joint CEC-CPUC-CAISO proposal to the State Water Resources Control Board (SWRCB), which was included in the proposed OTC policy now under review, calls for use of transmission originally needed for renewable resources to replace some OTC capacity. Studying OTC outside of this context does not provide information relevant to energy policy makers. CEC staff suggests keeping an OTC retirement scenario in CTPG's Phase 3 study plan.

2. Proposed out-of-state generation re-dispatch method

The Phase 3 study plan indicates that CTPG will continue using the generation re-dispatch method based on a 70/30 in-state/out-of-state generation re-dispatch approach for most scenarios. CTPG proposes to test the sensitivity of this assumption by using a fuel type re-dispatch method. If CTPG plans to provide

emission benefits based on this re-dispatch method, these results may be inaccurate and possibly misleading. CEC staff supports CTPG's Phase 3 testing of a sensitivity of the re-dispatch method used in Phase 2.

3. Amount of existing eligible renewable energy in the GE Maps dataset

CTPG has agreed to use the RETI forecast of renewable net short of 52,764 GWh for the year 2020. Implicit in this amount of renewable net short is an assumption that there is 41,239 GWh of existing California RPS eligible renewable energy. Does the GE Maps dataset used for this study include 41,239 GWh of existing eligible renewable energy in addition to the 52,764 GWh added as net short?

Contacts:

Karen Griffin, kgriffin@energy.state.ca.us

Angela Tanghetti, atanghet@energy.state.ca.us