



April 28, 2010

California Transmission Planning Group

This letter was submitted online at www.ctpg.us

RE: California Transmission Planning Group (“CTPG”) Comments on Second Phase Draft Study Results, Third Phase Draft Study Plan, and April 20, 2010 Stakeholder Meeting

Dear CTPG Members:

I am writing on behalf of the Large-scale Solar Association¹ (“LSA”). LSA is disappointed by the short stakeholder comment period for the April 20th workshop. Comments on the Draft Phase 2 Study Results (posted April 15th) and Phase 3 Study Plan (posted April 19th) are due April 28th, and the final versions of these documents will be posted four business days later, May 4th, 2010. Given the short comment period, these comments are brief and focus on several general issues of concern to LSA.

(1) The CTPG Should Provide For Transmission Capacity Additions Over Time.

LSA is concerned that the RETPP and the CTPG plan are scheduled to provide review and approval of new transmission lines so that the lines are built by the year 2020. The Phase 2 Study Results detail over 100 elements meeting various needs from the Phase 2 planning scenarios. However, it is unclear that any of these elements could be built in the near term. The 2020 deadline is disconnected from the fact that renewable generation developers must already have transmission hardware in the ground well before 2020 if their power purchase contract obligations and the state’s RPS goals are to be met. Power Purchase Agreements currently negotiated by developers require delivery of renewable power well before 2020 and the state’s renewables mandate is to have fully one-third of its electricity provided by renewables in that year. In other words, CTPG is not implementing the state’s policy if it does not provide a plan for transmission to be built in the near term. The plan should provide for transmission to come online throughout the period of 2010 - 2020.

¹ LSA represents twelve of the nation’s largest developers and providers of utility-scale solar generating resources. Collectively, LSA’s members have contracted to provide over 6 gigawatts (“GW”) of clean, sustainable solar power under contract to California’s load-serving entities (“LSEs”). Its members develop, own and operate various types of utility-scale solar technologies, including photovoltaic and solar thermal system designs. LSA, and its individual member companies, are leaders in the renewable energy industry, advancing solar generation technologies and advocating competitive market structures that facilitate significant integration of renewable energy throughout the western United States. LSA represents the interests of utility-scale solar development in California, Arizona, and Nevada, and also works to shape regional and federal policies that affect solar development.

(2) The CTPG Should Further Clarify Which Projects From The LGIP Are Being Incorporated Into The CTPG Statewide Plan.

The Phase 2 Study Results describe on Pages 29 – 35 a new Generation Interconnection Queue Based Portfolio. The portfolio is described as including the LGIP projects that are “the most advanced in their respective approval processes.” The CAISO should provide further clarification as to how it refined the list of projects it initially identified in the CAISO queue, and why certain projects in the CAISO queue were not included in the portfolio.

(3) The CTPG Should Detail How It Accounts For Transmission Projects Proposed In Out Of State Balancing Authorities.

The creation of an accurate and feasible transmission plan requires the CTPG to go beyond the California-only focus of the CTPG’s plan. The electric grid is not only interconnected throughout the west, but there are new demands for more coordinated interstate planning. To date, renewable generation developers have proposed a significant number of projects in neighboring states. An interregional planning approach will enhance both reliability and the capacity to integrate greater quantities of intermittent renewable energy and will promote compliance with Order 890. By creating a much wider footprint, LSEs could also meaningfully access not only “native” renewable generation, but also regional renewable generation. Doing so will maximize the value of clean power for California ratepayers, as well as ratepayers within the WECC.

We recognize that the CTPG has made important steps towards interstate planning by including a couple of scenarios that emphasize out-of-state renewables. The CTPG apparently took as a “given” (i.e. hardwired input assumption) interstate transfer capacity fixed at current levels. There seemed to be no consideration of expanded lines to accommodate renewable imports along with normal interchange energy.² Thus it is no surprise that, all of the proposed elements in the Phase 2 Study Results stop at California’s border (except in limited instances where CAISO control points extend outside of the state such as at El Dorado). Also, it appears that the Study Results have not been coordinated with transmission proposals in other States. We believe that this level of information sharing and coordination will be necessary for the CTPG plan and the CAISO’s RETPP to be Order 890 compliant. We therefore urge the CTPG to detail in the Phase 3 Study Plan how the CTPG will account for projects currently being developed in other State’s balancing authorities and otherwise allow for regional coordination.

If you have any questions, please do not hesitate to contact me by email at shannon@consciousventuresgroup.com or by phone at (415) 819 4285. Thank you for your consideration.

Sincerely,

/s/

Shannon Eddy
Executive Director of the Large-scale Solar Association

² This is in contrast to major intrastate constraints such as Path 15 where increased renewable procurement was added to other dispatched power to determine required transfer capacity.