

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

**Large-Scale Solar Association
Re: CTPG Comments on Draft Phase 2 Study Report, Draft Phase 3 Study Plan,
and April 20, 2010 Stakeholder Meeting**

Comment Received:

CTPG should provide for transmission capacity additions to come online throughout the period of 2010 – 2020 to allow renewable developers to meet the state’s renewables mandate.

CTPG Study Team Response:

CTPG has completed the Phase 2 Study using the WECC 2019 Heavy Summer base case for the WECC Interconnected system. The WECC 2019 base case includes those transmission capacity upgrades scheduled to come online throughout the 2010 - 2019 timeframe, so these upgrades are reflected in the CTPG studies. Please note that the WECC base case was modified to remove the Green Path North project and the addition of recently approved upgrades in the Barren Ridge/Haskell Canyon/Rinaldi area to reflect current information.

The Phase 2 Study Report identifies only those bulk transmission facilities on which thermal overloads were identified and has not explored a full range of transmission capacity additions and upgrades to mitigate these overloads. This will be done to some extent during the Phase 3 studies. In addition, CTPG has not explored a full range of wires and non-wires alternatives for mitigating identified overloads. This will be done by the appropriate transmission providers and owners at some future time.

CTPG is considering an approach for identifying “least regrets” elements of CTPG’s conceptual transmission plan that would place an emphasis on transmission upgrades that are identified in scenarios that correspond to an “expected” set of system conditions, that have a relatively higher likelihood of obtaining regulatory approvals and environmental permits, and that can be constructed and operational by year 2020. CTPG believes that such an approach would be helpful in identifying those transmission upgrades that can be placed in service prior to year 2020 and thereby expedite renewable resource development in those areas.

Comment Received:

CTPG should further clarify how projects from the CAISO interconnection queue are selected for inclusion in the Generator Interconnection Queue Based Portfolio as described on pages 29 – 35.

CTPG Study Team Response:

CTPG’s Phase 2 Study includes a scenario of renewable resource projects based on the interconnection queues of the CAISO and other CTPG members. For the projects in the CAISO interconnection queue, the criteria used to identify renewable generators are as follows:

1. All renewable projects with completed interconnection studies that have signed or are in the process of signing interconnection agreements, and/or;
2. All renewable projects in the Transition Cluster that have posted financial security pursuant to their interconnection agreements.

Comment Received:

CTPG should detail how it accounts for transmission projects proposed by out-of-state balancing authorities, study expanding interstate transfer capacity, and allow for regional coordination.

CTPG Study Team Response:

The WECC 2019 base case includes those transmission projects under development throughout the WECC region which are expected to be placed in-service in the 2010 – 2019 timeframe. The CTPG Phase 2 Study Report also includes several bulk interstate transmission upgrades, including upgrades to the California-Oregon Intertie facilities at Malin and Round Mountain, added transmission between Central Nevada and the Owens Valley, and additional transmission between El Dorado substation in southern Nevada and the Mountain Pass area west of the California-Nevada border.

CTPG will continue to conduct its planning and coordination activities in a manner consistent with FERC Order 890. As stated previously, as the work of the CTPG progresses, CTPG expects that it will be developing processes and practices to assure coordination of CTPG’s planning processes with other utilities throughout WECC.