

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

**Comments of the California Energy Commission Staff
Re Revised Draft Phase 3 Study Plan**

Comment Received:

CEC Staff suggests keeping a scenario of retirements for the State's Once Through Cooling (OTC) units in the Phase 3 Study Plan.

CTPG Study Team Response:

The purpose of the Phase 3 Study Plan is to build on work completed in Phase 1 and Phase 2 and reflect additional stakeholder input. Phase 3 is designed to analyze stakeholder-identified alternative transmission upgrades to mitigate reliability criteria violations identified in the Phase 2 studies, including those identified in the Once Through Cooling, Northern, Southwest, Owens Valley, and RETI Heavy In-State scenarios.

Comment Received:

CEC staff supports CTPG's Phase 3 testing of a sensitivity of the re-dispatch method used in Phase 2 instead of a fuel type re-dispatch method, due to inaccurate and possibly misleading emissions benefits results.

CTPG Study Team Response:

In the CTPG Phase 3 study, CTPG will continue to utilize the 70/30 in-state/out-of-state generation re-dispatch methodology utilized in the Phase 2 Study with higher heat rate units turned down first. Additionally, CTPG will test the sensitivity of this methodology using an out-of-state re-dispatch method that does not limit the generation reductions by geographic criteria within WECC, and re-dispatches based both on fuel type and heat rate.

The purpose of this sensitivity analysis is to identify system impacts caused by generation re-dispatch on a broad emissions reduction basis, not specific to individual fossil fuel units.

Comment Received:

Does the GE Maps dataset used to generate the RETI forecast 2020 net short of 52,765 gigawatt-hours include 41,239 gigawatt-hours of existing renewable energy?

CTPG Study Team Response:

The CTPG Phase 3 Net Short Forecast of 52,764 gigawatt-hours is the same net short as used in Phase 2 studies. This net short was developed in consultation with the California Renewable Energy Transmission Initiative Transmission Working Group using the methodology in the Initiative's Net Short Update dated January 2010. Additional information about the methodology used to derive the RETI net short can be found at the RETI Transmission Working Subgroup website: www.energy.ca.gov/reli/steering/workgroups/technical.