Response of the California Transmission Planning Group
Study Team to

Comments of DayStar Farms
Regarding CTPG's Phase 3 Study Plan

Comment Received:

The Draft 2010 CTPG Phase 2 Study Report includes an "Owens Valley Resource Study Scenario". It is not clear why this study was conducted. DayStar Farms requests that a similar study be conducted specifically for the Fairmont CREZ with generation of 2,100 megawatts of solar generation interconnecting into both the Southern California Edison Vincent-Lugo line and the Los Angeles Department of Water and Power Adelanto-Rinaldi and Victorville-Rinaldi lines.

CTPG Study Team Response:

With respect to the Owens Valley Scenario included as part of the CTPG Phase 2 Study, the Los Angeles Department of Water and Power (LADWP) submitted the request for this study during the Phase 2 Study Plan comment period which ran from January 29, 2010, to February 8, 2010. In addition, various stakeholders, including the California Renewable Energy Transmission Initiative, requested that disturbed lands and brownfield locations, such as Owens Valley, should be considered environmentally preferred CREZ locations. Based on the combined recommendation of these entities, the Owens Valley Scenario was added to the Phase 2 Study Plan.

With respect to the resource potential of the Fairmont CREZ, as noted in table 4.3 of the Draft Phase 2 Study Report, the Fairmont CREZ has been modeled at a variety of levels as determined by the various renewable portfolios. In the CTPG Phase 1 Study, 345 megawatts of resources were modeled in the Fairmont CREZ based upon Power Purchase Agreements (PPAs) executed by California load-serving entities (LSEs). In the CTPG Phase 2 Study, the Generation Interconnection Queue case did not model resources in this area due to the absence of these resources from any of the California Balancing Area Authority interconnection queues. Also, in the Phase 2 Study, the California Renewable Energy Transmission Initiative Heavy In-State case modeled 1,126 megawatts of resources in the Fairmont CREZ as determined by the Initiative's assessment of in-state renewable resource feasibility. The CTPG believes the combined review of the California Renewable Energy Transmission Initiative analysis and the Generation Interconnection Queue data provides a supportable case for the development of resources in the Fairmont CREZ for up to 1,126 megawatts. At this time CTPG considers this assessment of the Fairmont CREZ sufficient.