

Comments on the CTPG Phase III Draft Report dated June 14, 2010

Great Basin Energy Development

Great Basin Energy Development (“Great Basin”) has proposed 1000 kV underground HVDC link between the geothermal renewable resources of northern Nevada and northern California. As per our submitted proposal of March 22, 2010, the link’s design and route have not yet been finalized or optimized.

On April 23, Great Basin had a brief telephone call with the CTPG Technical Committee to further outline the proposed project. A portion of that call included a discussion where Great Basin explained that it had not yet finalized its western terminal point in California but, as per its submittal, had identified Rio Oso on the PG&E system, and Elverta and O’Banion on the Western System, as likely beneficial interconnect locations. Great Basin understands that injection from a HVDC converter station provides significant reactive power reserve to the grid and, based on public domain documents indicating voltage support issues in the greater Sacramento area, that an HVDC tie in the greater Sacramento area may offer reliability benefits. During the call with the CTPG, it was suggested by members of the Technical Committee that given the short time the CTPG had for analysis and the size of the line, Great Basin should connect at a strong location on a 500 kV system, such as Table Mountain. Great Basin agreed that, at a high level, 1,000 MW is a significant injection of power and for that reason it might make more sense to be on a 500 kV system instead of a 230 kV system, and further agreed that Table Mountain could be an alternative for the Committee to consider (although not one Great Basin had previously considered).

On April 25, 2010, submitted technical data concerning the project for modeling and interconnect of the HVDC link to the Table Mountain Substation.

On June 7, Great Basin was contacted by the Technical Committee and notified that Great Basin’s HVDC project would not be modeled during CTPG Phase III because it “was not of benefit to the California transmission system by connecting at Table Mountain.”

The Phase III Report Draft (Section 8.4.3) issued on June 14, 2010, states that the Technical Steering Committee “considered only the project information provided by Great Basin.” We would, respectfully, note the choice of modeling the Table Mountain point was given, in part, at the suggestion of the Committee; and that it is, and has been, Great Basin’s view that Rio Oso, Elverta or O’Banion substations are potentially better suited for interconnecting the proposed line.

Great Basin understands the highly technical nature of transmission analysis and also that there are many issues in creating analysis cases, such as input of generation, nomograms on existing transfer capability, etc. We also respect the CPTG’s desire to maintain a disciplined and timely process, and that less technically mature projects, such as Great Basin’s line, may not efficiently integrate into the Phase III planning process. Further, we do appreciate the statement from the Technical Steering Committee in the Phase III Draft Report that states, “the conclusion reached is in the context of the studies being performed and should not be interpreted as an assessment of the potential merits of the project, or its variations.” However, we are concerned that this nuanced response may not be fully appreciated later in the process and, therefore, that the Great Basin project will not be given full consideration, in spite of its benefits of offering an innovative and environmentally sensitive design, within existing corridors, that provides Northern California a unique transmission link to cost-competitive base load renewable resources within the CPTG’s 10-year planning horizon.

For these reasons, we ask that the Technical Committee consider working with Great Basin to evaluate one of the three injection points (Oso, Elverta or O'Banion) previously recommended by Great Basin in its original submittal. Our technical studies of these three alternative injection points are on-going and we believe that we may be able to recommend one of these alternatives for further consideration no later than July 12th.

Respectfully,

Jeff Schroeter
Partner
Great Basin Energy Development
1400 Preston Road, Suite 400
Plano, TX 75093