

## Foresight Comments on CTPG Phase 3 Report

- Foresight Wind Energy has an active development effort in Lassen County to develop a utility-scale wind project of 100 - 200 MW nameplate installed capacity which could provide renewable energy directly to Northern California load area and promote economic ion a depressed, rural part of the state.
- The RETI has identified a very large potential wind resource, 1,467 MW in Phase 2B Final Report, in the Lassen North CREZ
- The transmission costs and associated rankings identified in RETI Phase 2A Report (Section 3.5.14) and utilized by the CTPG for Lassen North CREZ are incorrect and no longer valid for the following reasons:
  - The cost estimates and environmental impacts for the Lassen North CREZ transmission are based on the now defunct TANC Transmission Project (TTP).
  - The high cost of the TTP, estimated at \$735 million by RETI in the Phase 2A Report Table 1-1, and large environmental impact associated with the TTP, including the second worst environmental score of any proposed transmission project evaluated by RETI (a weighted score of 600, RETI Phase 2A Table 1-1 pg 1.18 ), resulted in an incorrect low ranking for the Lassen North CREZ .
  - TTP has been cancelled hence the associated rankings by RETI of the Lassen North CREZ are no longer valid.
- A new cost effective transmission solution for the Lassen North CREZ has been proposed by the Lassen Municipal Utility District (LMUD). The proposed LMUD 230 kV solution utilizes existing Right of Way corridors and has a capital cost of only a fraction of the previously proposed TTP solution.
- The utilization of existing transmission corridors would result in a very high environmental ranking when evaluated under the RETI criteria.
- The combined cost savings and improved environmental score would make the Lassen North CREZ a viable renewable energy zone.
- The Lassen North CREZ is the only large undeveloped area of high wind resource in all of Northern California.

- Relying on Southern California CREZs to supply almost all of the Northern California LSE renewable RPS requirements is bad policy for the following reasons:
  - Lack of resource diversity
  - Transmission congestion on the north -south paths
  - Unequal regional distribution of the economic benefits associated with renewable energy development
  
- The Lassen North CREZ and the proposed LMUD 230 kV Transmission Project should be evaluated in the CTPG process and should not be excluded from the CTPG Phase 3 scenario, or future CTPG scenarios.