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Q1

The CTPG Phase 3 Study Report (“Report”) states on page five that an “important further qualification of the CTPG process...is that CTPG is not a transmission or generation project decision-making body.” The Report goes on to say that such decisions will be made by the CTPG members that are planning entities for their Balancing Authority Areas and therefore the 2010 statewide is meant to be “truly conceptual, not prescriptive...”

Questions:

The comment appears to ignore the fact that CTPG is itself made up of those precise entities that will make project decisions, therefore, how will CTPG insure that preferences driven out in private during proprietary CTPG study work aren't “rubber stamp” approved by the BAAs (read: CTPG members) when project selection time arrives? What will CTPG do to insure that the outcome of CTPG's efforts is indeed considered by CAISO, TOs, LSEs, CPUC and others as “conceptual”?

Q2

On page 5 of the Report CTPG states that at the end of Phase 3 that it expects that the identified bulk transmission needs will be “further analyzed and refined, including wires and non-wires alternatives for addressing those needs, by different planning entities, evaluated through their respective stakeholder process.”

Questions:

Please elaborate on this statement by identifying the “planning entities” envisioned as well as the “stakeholder process” they will follow, if known. In addition, please state what exactly CTPG considers as “non-wire” alternatives in this context and how plans created by these other entities via their stakeholder processes will fold back into the CTPG process, if it will.

Q3

On pages six and seven the Report states that CTPG provided wires recommendations only, and “did not conduct a deliverability analysis to determine the necessary improvements and operating methodology for delivery of renewables to fulfill Resource Adequacy eligibility and to provide integration capability for variable generation...”

Questions:

When and how does CTPG expect to integrate this level of planning (RA & VG integration) into its own process and moreover the larger CAISO RTPP process?

INDEPENDENT ENERGY PRODUCERS

Q4

On the same point as above, the Report anticipates that this type of study, meaning RA and VG integration, will be completed by the entity responsible for each project utilizing “its own analysis assumptions.” The Report concludes that CTPG may perform this analysis in future studies.

Questions:

What process does CTPG envision that will insure some standardization in the assumptions utilized in these processes?

Q5

CTPG modified various RETI 2A findings in the Phase 1 Study that serve as the basis for Phase 2 and now Phase 3 findings. In Phase 1 CTPG provided Table #6 (excerpted below) to identify differences between the generation resource scenario in RETI 2A and CTPG.

Table 6: CTPG Renewable Generation Comparison to RETI

Location (Region/CREZ)	CTPG		RETI*	
	Installed Capacity (MW)	Identified Annual Renewable Energy Production (GWh)	Maximum Potential Installed Capacity adjusted for success rate (MW)	Identified Potential Annual Renewable Energy Production adjusted for success rate (GWh)
British Columbia	0	0	340	1849
Washington	963	2594	0	0
Montana	413	1111	N/A	N/A
Idaho	130	350	N/A	N/A
Oregon	1637	4408	392	3062
Round Mountain-A	0	0	101	710
Round Mountain-B	78	319	49	196
Lassen North	873	2262	387	999

The Report states that Phase 1 differed from RETI in that CTPG studied a portfolio based on “the commercial interest” expressed by CTPG LSE procurement plans. Phase 2, as reported, further refined the portfolio based on interconnection requests and other factors that CTPG believed would better determine projects that were more likely to be developed.

Questions:

The process described in the Report indicates and jointly developed CTPG methodology was employed to create the modified portfolios using some means or metric to evaluating actual generation projects and weighting them by

INDEPENDENT ENERGY PRODUCERS

specific criteria. Please provide the evaluation work papers/analysis tools that were utilized to modify each phase of planning from RETI 2A through each step of refinement up through Phase 3 and the current Report.

Table 4.3, 4.4 and 4.6 of the Report identifies projected generation resources from each CREZ between RETI 2A through CTPG Phase 3, and includes detail regarding assumed resource by generation type. For those significant changes in expected CREZ resource quantities (i.e. 100 MW or more for all combined generation types in a CREZ) and significant changes in generation-specific resource assumptions within any CREZ, please provide commentary about the assumptions that support those changes.

Where specific projects are impacted by planning assumptions perhaps specific to a CREZ, technology type, or other factor, please identify each.

Q6

On Page 7, the report states that, in Phase 1 the CTPG studied “a renewable generation portfolio that was based on the commercial interest expressed by the CTPG member’s [sic] Load Serving Entity Procurement Plans.”

Questions:

Please: (1) indicate the documents referred to as “the CTPG member’s Load Serving Entity Procurement Plans;” and (2) if the supply sources and procurement amounts are not the same as stated in those documents, please describe the changes that were made and the reasons for those changes.

Q7

Tables 4.3 and 4.4 both show the RETI Best CREZ portfolio, but the CREZ/area identifications appear to be labeled 187 MW of installed renewable capacity and 1,259 GWh of renewable energy capacity for “Nevada” (Table 4.3), with 1,120 GWh of this generation apparently consisting of geothermal generation in the “Nevada-Owens” area.

Questions:

- (1) Please explain the differences between the CREZs/areas in the two tables, e.g., between the “Nevada” area in Table 4.3, the “Nevada-Mountain Pass” and “Nevada-Owens” areas in Table 4.4, and the Nevada North CREZ.*
- (2) Please explain any differences between the transmission paths assumed in the RETI analyses and the transmission paths in the CTPG Report, e.g., for Nevada North generation.*

INDEPENDENT ENERGY PRODUCERS

Q8

In Section 8 (“Transmission Needs Alternative Analysis”), the Report states that, “in order for the comparison studies [of transmission alternatives submitted by stakeholders] to be consistent, the CTPG will use the scenarios developed in Phase 2 as basis for the power flow studies” to assess those alternatives.

Questions:

Why is it necessary to use the Phase 2 scenarios instead of the Phase 3 scenarios for the analyses to be “consistent”? Why couldn’t they be made “consistent” by assuming the Phase 3 scenarios instead, or by examining them under both the Phase 2 and Phase 3 scenarios? This is particularly important for project suggestions, like #3 (“Path 52 Connections for Nevada Resources”) that would be particularly well-suited for the Phase 3 scenarios (e.g., those with higher (we would argue more realistic) amounts of Nevada North geothermal generation).

Q9

In Section 8 (“Transmission Needs Alternative Analysis”), the Report states at p.75 that that the Phase 3 analyses assumed that only half of the Nevada North geothermal and wind resources in the NV Energy interconnection queue would actually be developed, and that this generation would be interconnected through the Lassen North CREZ. It appears that the report simply calculated a number for the additional assumed Nevada North wind and geothermal generation and then “characterized” it as “Nevada North” generation – i.e., it did not actually add any Nevada North generation but simply called what was Lassen North generation “Nevada North” generation.

Questions:

- (1) Please describe the reasons why the Nevada North generation in the NV Energy queue was cut in half for this analysis.*
- (2) How does this assumption compare with the treatment of generation in the CTPG members’ interconnection queues? Were those also cut by 50% and, if not, why not?*
- (3) What is the basis for assuming that this generation would interconnect through the Lassen CREZ, instead of through the existing Path 52 transmission path? What was the reason for making this assumption in the RETI Best CREZ scenarios, even though the RETI analyses assumed a Path 52 import point? Please provide specific citations of documents or quotes from your sources.*

INDEPENDENT ENERGY PRODUCERS

Q10

Section 9 (“Least Regrets Analysis”) is entirely blank, and Section 10 (“Findings, Conclusions, and Recommendations”) appears to be a simple compilation of the findings of the different scenario analyses.

Questions:

- (1) Please describe: (1) how the CTPG plans to conduct such “least regrets analysis” from all the different cases and scenario results in the Phase 1-3 study reports; (2) when the CTPG plans to release that analysis; and (3) the opportunities that stakeholders will have to comment on this portion of the report.*
- (2) How will the “least regrets” results that will be in Section 9 relate to the “findings, conclusions, and recommendations” in Section 10?*