

**Response of the California Transmission Planning Group
Technical Study Team
To
Comments of PDS Consulting, PLC
On
Second Draft CTPG Phase 3 Study Report**

Comment Received

The proposed North Gila to Imperial Valley #2 Project is a critical link that has been proposed to strengthen the ties west of the Colorado River. CTPG's study cases have shown significant flows on the existing North Gila to Imperial Valley line (greater than 1600 megawatts) and that an outage of the existing line can cause overloads on the Palo Verde to Devers system. The line has been tested by CTPG at a very high level by removing several of the Imperial Irrigation District (IID) transmission projects. The proposed North Gila to Imperial Valley #2 is not intended to compete with the delivery plans of IID but to complement them. The analyses that have been completed to date show that a minimum of approximately an incremental 2000 megawatts can be delivered to the region (both in Arizona and California) for a relatively short project (approximately 80 miles). We suggest that additional studies be completed with higher west-of-river flows and the potential renewable energy zones in southern California and Arizona be examined.

CTPG Study Team Response

The Desert Southwest scenario (B-SW), studied in Phase 2 of CTPG's work, simulated flows of about 1775 megawatts on the existing North Gila to Imperial Valley line. The study also identified overload on the west-of-Devers 230-kV lines for an outage of the existing North Gila to Imperial Valley line. As mentioned in the Draft Phase 3 Study Report under the "Transmission Need Alternative Analysis" section, the proposed North Gila-Highline-Imperial Valley #2 500-kV alternative was tested using the "B-SW" scenario. Our analysis showed that this alternative did reduce flows from Palo Verde to Colorado River substation and into the Los Angeles Basin on the west-of-Devers system and the Devers-Valley-Serrano lines, but did not completely eliminate the contingency-based thermal overloads on the west-of-Devers and Devers-Valley-Serrano systems identified in the CTPG Phase 2 Study.

Additionally, as mentioned in the CTPG Draft Phase 3 Report under the "Next Steps" section, it is anticipated that CTPG's 2011 activities will provide an additional opportunity for stakeholders to submit additional resource scenarios to be evaluated. It is recommended that the sponsors of the North Gila-Highline-Imperial Valley project submit to CTPG the renewable resource development portfolio that the project sponsor believes is most likely to be in place in year 2020, and the basis for that belief, as CTPG's 2011 studies begin.