

The Vote Solar Initiative Comments
on the
Draft 2010 CTPG Phase 4 Study Plan

The Vote Solar Initiative (Vote Solar) is a non-profit, grassroots and foundation supported policy advocacy organization working to bring solar power to the mainstream. In addition to our efforts supporting distributed solar generation technologies, Vote Solar works to create policies enabling large, centralized solar generation. In support of this effort, Vote Solar represents solar technology on the newly-formed Regional Transmission Expansion Planning (RTEP) process, funded by the Department of Energy (DOE) and administered by the Western Electricity Coordinating Council (WECC).

Vote Solar appreciates the opportunity to comment on the Draft 2010 CTPG Phase 4 Study Plan and we encourage the CTPG to keep this process open and transparent and to include stakeholder input in the earliest planning stages. Including input from stakeholders early on will minimize delays and increase the accuracy and viability of the study plan.

For this effort to be most useful, we encourage the CTPG to include in its analysis and evaluation of the resources, renewable resource zones (REZs) and transmission corridors identified in the various REZ processes that have taken place throughout the Southwest¹. We further encourage CTPG to include a high-level economic evaluation of resources planned for these zones to help identify where transmission additions and expansions are most likely to occur. The National Renewable Energy Laboratory (NREL) recently performed such an analysis, albeit at a very high level, that could be used as a model to inform the Phase 4 Study Plan².

It is becoming more and more important to understand the integrated resource plans across the region to understand the potential impacts of fossil plant retirements due to once-through cooling regulations and new air emissions laws, potential demand side measures, including distributed photovoltaics, and policies driving increased interest in renewable energy development. While we understand CTPG has surveyed other utilities and received input on these developments, we are concerned that there is no formal process or venue to support an ongoing two-way dialogue among regional transmission planning entities. As policies evolve, technologies mature, and procedures to address integration of variable generating resources are developed and

¹ Examples include the Western Governors Association's Western Renewable Energy Zones effort, Nevada's Renewable Energy Transmission Access Advisory Committee (RETAC) Phase I and II reports, and the Renewable Transmission Task Force findings presented to the Arizona Corporation Commission.

² Renewable Resources and Transmission: Needs and Gaps, Dr. David Hurlbut, National Renewable Energy Laboratory; May 21, 2010; presentation to Southwest Renewable Energy Transmission Workshop; <http://www.azcc.gov/images/presentations/NREL/Hurlbut%20NREL.pdf>

implemented, it becomes more important to have a process for communicating these developments across the region to feed into future planning efforts.

Along those lines, the WECC RTEP process previously mentioned is looking into many of these issues and is developing 10- and 20-year regional transmission study plans that could inform and be informed by the CTPG's efforts. As a member of the RTEP Scenario Planning Steering Committee (SPSG), we encourage CTPG to have an open channel of communication with this effort so that the needs of the region are addressed and to avoid duplicative or conflicting planning efforts.

Finally, we encourage the CTPG not to assume that only new gas turbines built in California will be used to "firm" or "balance" renewables. We believe this balancing can and will eventually occur among the various renewable generating resources, which will require better coordination between balancing authorities, better forecasting of renewable resources, and tighter scheduling.

Respectfully submitted by:

A handwritten signature in black ink, appearing to read "Jim Baak", with a long horizontal flourish extending to the right.

Jim Baak

Director of Policy for Utility-Scale Solar

The Vote Solar Initiative

300 Brannan St., Suite 609

San Francisco, CA 94553

(415) 817-5064

jbaak@votesolar.org

www.votesolar.org