

**California Transmission Planning Group (CTPG)
Technical Study Team's Response to the
Comments of the Natural Resources Defense Council (NRDC) on the
CTPG's draft Phase 4 Study Plan**

NRDC Comment:

NRDC request[s] that the California Transmission Planning Group (CTPG) analyze the Westlands Solar Park (WSP) 5,000-megawatt RETI-designated renewable energy zone in the CTPG Phase 4 Study Plan.

Recent developments have increased the need for this review as commercial interest in the site has increased. As you know, RETI has identified this area as an official zone with up to five gigawatts of nameplate potential solar generation capacity. In light of the increasing commercial interest in the Westlands Solar Park, it is essential the area gets studied more closely for transmission upgrades.

Increasing our reliance on disturbed landscapes has been one of the environmental stakeholders' in both RETI and CTPG's highest priorities. The possibility of swift permit approvals and few environmental impacts for and from projects in this area make the Westlands Solar Park an important area for the state in pursuit of both its RPS and AB 32 goals.

Because CTPG has included representatives of both public and private utilities in its efforts, and because collaboration between these entities and the California Independent System Operator (CAISO) will be critical for enabling transmission improvements for the WSP, it is imperative that the transmission needs for this project be studied by CTPG.

NRDC believes that transmission for the WSP would provide added reliability benefits, a stronger north-south connection enabling the wheeling of renewables from eastern California and neighboring states to the rest of the state, possibly allow California to make use of ARRA funding from the Western Area Power Administration to reduce consumer costs for renewable energy transmission, and provide system support by complementing generation shapes from other renewable energy resources – such as Tehachapi wind – throughout California. These are powerful benefits arguing for the inclusion of this resource in CTPG phase four study plan. Excluding this could prejudice the development of this valuable and location constrained resource area.”

CTPG Technical Study Team Response:

The CTPG Technical Study Team appreciates NRDC's interest in exploring the transmission needs that would accompany renewable resource development in the Westlands CREZ totaling 5,000 megawatts of installed solar capacity. NRDC does not indicate what solar technologies would comprise this solar capacity, however, in connection with CTPG's Phase 3 studies, the Renewable Energy Transmission Initiative (RETI) provided the CTPG with a “Best CREZ” renewable portfolio that included 2,539 megawatts of installed solar thermal generating capacity in the Westlands CREZ.

The CTPG evaluated the “Best CREZ” renewable portfolio in Phase 3 and the results are discussed in sections 7.2 and 7.3 of the final Phase 3 Study Report. NRDC is encouraged to review these results to gauge the extent to which the CTPG has already addressed NRDC's interests in the Westlands CREZ.

Given the current schedule for completing the Phase 4 study work, the CTPG does not expect to have sufficient time, in Phase 4, to perform analyses of a renewable resource development portfolio that would include 5,000 megawatts of installed solar capacity in the Westlands CREZ. However, in the event the

NRDC determines that the CTPG Phase 3 studies do not address the potential resource and transmission needs associated with the Westlands CREZ adequately, the CTPG will consider NRDC's study request as it develops its study plans for year 2011.