

**California Transmission Planning Group (CTPG)
Technical Study Team's Response to the
Comments of the Sierra Club
on CTPG's Draft Phase 4 Study Plan**

Sierra Club Comment:

The Sierra Club joins other environmental voices in requesting that the California Transmission Planning Group (CTPG) include the Westlands Solar Park renewable energy zone in the CTPG Phase 4 Study Plan.

The Central Valley is increasingly being looked to as a highly appropriate location for development of large-scale renewable energy zones (REZs). Commercial interests, including California utilities and leading solar companies, have expressed their strong interest in solar development in this region. The Westlands Solar Park is a leading potential site for large-scale commercial solar development, and it has already been identified by the California Renewable Energy Transmission Initiative (RETI) as an official renewable energy zone with up to 5,000 megawatts of potential solar generation capacity.

The importance and urgency of evaluating the southern Central Valley, and the Westlands Solar Park in particular, arises because that location possesses strong insolation on large swaths of privately held lands that, in contrast to other sun-rich parts of California, have relatively few wildlife or other ecologically important resources; this should create a pathway toward relatively rapid permitting compared to the experience in other areas of California. Moreover, solar development in the southern Central Valley would provide important job-creation and economic benefits to underserved communities there.

Together, these factors make the Westlands Solar Park particularly well-suited for consideration of large-scale solar development to meet California's renewable energy requirements. It is critical, then, that this area be evaluated closely by the CTPG for potential transmission upgrades.

CTPG Technical Study Team Response:

The CTPG Technical Study Team appreciates the Sierra Club's interest in evaluating potential transmission upgrades that support renewable resource development in California's Central Valley, including the Westlands CREZ. The Sierra Club does not indicate what solar technologies would comprise the large-scale solar development and, except for the Westlands CREZ, does not indicate where this solar capacity might be constructed. 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 2539 MW of installed solar thermal generating capacity in the Westlands CREZ.

The CTPG evaluated transmission system impacts of the "Best CREZ" renewable portfolio in Phase 3 and the results of this evaluation are discussed in sections 7.2 and 7.3 of the final Phase 3 Study Report dated September 10, 2010. The Sierra Club is encouraged to review the results of these studies to gauge the extent to which the CTPG has already addressed the Sierra Club's interests in large-scale solar development in California's Central Valley.

Given the current schedule for completing the Phase 4 study work, the CTPG does not expect to have time, in Phase 4, to perform technical analysis of a renewable resource development portfolio that would include

5,000 megawatts of installed solar capacity in the Westlands CREZ. However, the CTPG does intend to review the results of the Phase 3 work that used the “Best CREZ” renewable portfolio to provide an indication of what might be expected with renewable resource development in the Westlands CREZ that exceeds the 2539 megawatts level studied in Phase 3. The CTPG expects that information summarizing its findings will be provided in the Phase 4 study report. In addition, the CTPG will consider the Sierra Club’s comments as it develops its study plans for year 2011.

Finally, the CTPG notes that the renewable resource portfolio provided by RETI for use in the CTPG’s Phase 4 West of River Stress Scenario includes—via the “Discounted Core” portion of the portfolio—50 megawatts of installed solar photovoltaic generation in the Westlands CREZ. The Sierra Club is encouraged to work with RETI in the developing and refining the renewable resource portfolios that are most likely to play out over time. Rich Ferguson is the RETI coordinator and he can be reached at rich@ceert.org.