

The Vote Solar Initiative Comments

2010 CTPG Draft Phase 4 Study Report & Draft 2010 Statewide Transmission Plan

January 18, 2011

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 Regional Transmission Expansion Planning (RTEP) process, funded by the Department of Energy (DOE) and administered by the Western Electricity Coordinating Council (WECC).

In our comments on the Draft Phase 4 Study Report submitted in October 2010, Vote Solar offered the following comments and recommendations:

- 1) Keep the process transparent and open to stakeholder input;
- 2) Include economic evaluation of resources throughout the Western Interconnection to identify needed transmission to support regional needs;
- 3) Create a formal process for coordinating resource and transmission planning and operation throughout the Western Interconnection;
- 4) Create a tighter link to WECC's Regional Transmission Expansion Planning process;
- 5) Evaluate the potential for using renewable generation to balance renewable energy across the region, rather than planning to build a significant amount new natural gas plants for firming renewable energy.

We reiterate our previous comments for the final 2010 Phase 4 Study Report and the 2010 Statewide Transmission Plan, and offer the following suggestions with an eye towards a future role for the CTPG.

We strongly encourage the CTPG to expand its focus to support a regional renewable energy perspective. Rather than focusing on developing California's resources and transmission to support reaching the current 33% renewable portfolio standard, we believe it's in the best interests of the citizens and ratepayers of the state to have a more regional, WECC-wide and longer term approach. That is to say, the objective ought to be finding the most economical and sustainable renewable energy resources that can be brought to market in the quickest timeframe and with minimal impact on the environment. For the state to meet its energy and environmental policy goals at the least cost to consumers and least impact to the environment, the resources and transmission plans from across the region must be considered. The National Renewable Energy Laboratory prepared a report last May (referenced in our October 2010 comments) indicating a potential for California to export geothermal energy to Arizona, further supporting a regional approach to transmission and resource planning.

We recognize that the CTPG is not a policy-setting organization in its current form, but we also strongly suggest that the Study Plan and Statewide Transmission Plan do more to inform policy and provide guidance for policy-makers. With the dissolution of RETI, CTPG is the only organization that represents a broad spectrum of California's transmission interests in planning to meet the state's energy and

environmental policy goals. We believe that it's entirely within the capabilities of this organization to participate in, inform and help shape how the state, and the western region, achieves these policy goals.

We believe CTPG should evaluate scenarios for meeting regional policy goals to help shape its transmission plans. CTPG should continue to seek stakeholder input for which scenarios to study, coordinating with WECC and the SPSG to avoid duplication of effort and ensure consistency in planning efforts. One scenario we recommend studying would be to use renewable resources across the Western Interconnection to balance renewables within California instead of relying on new natural gas plants for firming renewable energy. Scenarios that envision greater than 33% adoption of renewable energy, higher penetration of distributed generation, greater levels of energy efficiency, centralized and distributed energy storage resource development, higher levels of electric vehicle penetration, more coal and fossil plant retirements throughout the region, and a California renewable export potential should also be investigated.

Vote Solar is working in neighboring states to create transmission and resource planning groups and processes that we envision will enable a more coordinated and cooperative process for regional planning, cost allocation and greater coordination amongst balancing area authorities in operating the grid. We strongly recommend that CTPG consider participating in such a formalized process across the region to achieve the current and future energy and environmental policy objectives of the region.

Respectfully submitted by:

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

Jim Baak

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