

**California Transmission Planning Group (CTPG)  
Technical Study Team Response to  
Comments of the Independent Energy Producers (IEP) on  
CTPG's draft Phase 4 Study Report and draft Statewide Transmission Plan**

**Comment:**

“At the January 7th stakeholder meeting IEP requested and CTPG responded to the observation that there appears to be a contradiction between the CTPG Phase IV Study Report (‘Study Report’) and the CAISO 2010/2011 Transmission Plan (‘CAISO Plan’). Specifically, the Study Report indicates that the ‘high potential projects’ from CTPG Phases III and IV would provide sufficient capacity for only 22% to 24% RPS. On the other hand, the CAISO Plan states that the ‘ISO-approved transmission for renewable resources within our footprint is adequate for now.’<sup>1</sup> As has been explained by CAISO, the ISO plan includes the same high potential transmission identified by CTPG.

The comments offered by CTPG at the meeting addressed the reasons why the two studies would be expected to return conflicting results. Based on CTPG's comments, IEPs understand that the key reason for the different conclusions comes down to assumptions, many on material items such as thermal generation re-dispatch methodologies. Statewide transmission planning involves many other organizations (or at least their data) besides CTPG and the CAISO. IEP is concerned that differences in assumptions has the potential to increase uncertainty of regulatory and commercial outcomes. Due to the fact that the CAISO will receive and consider CTPG's statewide transmission plan and, by association, the studies that underlie the statewide plan, IEP provides the following feedback comments:

- *IEP requests that CTPG insert a brief discussion in the final draft of the statewide plan discussion to articulate the differences between the CTPG plan and the CAISO plan, including key assumptions and interpretations of the study results, and help the many readers in and outside of the stakeholder parties understand why additional transmission may in fact be necessary in order to connect the required generation to meet 33%, even though the CAISO report may seem to suggest the opposite.”*

**CTPG Technical Study Team Response:**

As was explained at the stakeholder meeting, the CTPG statewide transmission plan is intended to reflect the results of the CTPG Technical Study Team's work based on input received and agreed to by its members and participants. In this case the CTPG concluded that generation dispatch methodology plays a significant role in determining the results and conclusions of the analysis. As such, the CTPG agreed that the results of its' and the CAISO's work should stand on their own merits and be reported within their respective planning documents. To this end, the CTPG believes it is important to publish its findings and move on to determining the work that should be completed in 2011. As such, the CTPG statewide transmission plan will not be revised to include the discussion IEP has requested.

**Comment:**

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<sup>1</sup> “Briefing on ISO Transmission for 33% RPS Plan”, Keith E. Casey, Vice President, Market and Infrastructure Development, CAISO, Board of Governors Meeting, General Session, December 15-16, 2010.

- *“In addition, IEP requests that CTPG advocate for processes within the CTPG, CAISO, and other planning venues across California that drive toward standardized assumptions on key input variables.”*

**CTPG Technical Study Team Response:**

The CTPG technical study team agrees that the use of standardized assumptions in the various planning venues in California should lead to study results that are more consistent. For example, the common use of load forecasts, and projections of expected energy efficiency and distributed generation impacts, developed for the California Energy Commission’s (CEC’s) Integrated Energy Policy Report (IEPR) has removed a significant element of uncertainty from a number of planning venues in California. However, it should be recognized that “standardized assumptions” only make sense where there is general agreement on what those assumptions should be.

**Comment:**

“IEP has been active and vocal throughout the CTPG stakeholder process. CTPG has recognized IEPs inherent interest in the process that CTPG has and will conduct with respect to transmission planning. IEP reacted very positively to CTPG’s recent comments regarding expanded stakeholder involvement in the process, where participants would be asked to fill a role contributing content and not just comment. IEP was also very interested to read Section 8.1.5 of the ‘lessons learned’ section of the draft statewide plan where CTPG calls for more and deeper stakeholder involvement.

- *IEP continues to support an expanded role for stakeholders and IEP requests that CTPG provide a draft of its plan to make that participation happen in 2011.*
- *IEP also requests that CTPG consider the constitution of an expanded, active, CTPG group as it may address the absence of the process embodied by RETI and ultimately work toward the improvement of planning processes that make timely transmission development possible.”*

**CTPG Technical Study Team Response:**

CTPG appreciates IEP’s comments regarding the possibility of an expanded role for stakeholders and continues to discuss this issue internally.

CTPG understands IEP’s interest in expanding the CTPG to include other members. This matter is the subject of ongoing discussion among the current CTPG members.