

**California Transmission Planning Group (CTPG)
Technical Study Team Response to
Comments of the Large-Scale Solar Association (LSA) on
CTPG's Draft Phase 4 Study Report, Draft Statewide Transmission Plan, and January 7,
2010, Stakeholder Meeting**

Comment:

The CTPG has provided more specific information about the criteria for generation-project inclusion in the in-state CTPG portfolios. However, the CTPG should include, in the final report, further information about exactly which generation projects are included in the analysis. The LSA also agrees with comments from stakeholders at the meeting that megawatt capacity numbers, and not just megawatthours, should be provided for each Competitive Renewable Energy Zone (CREZ).

CTPG Technical Study Team Response:

The CTPG appreciates the LSA's interest in identifying exactly which generation projects are included in the CTPG's analysis. However, this information is often not available due to three main reasons: (i) the renewable resource development portfolios are developed on the basis of generic data concerning the economic and environmental feasibility of developing renewable resources in different locations; (ii) the identity of specific generators in the renewable resource development portfolio is considered confidential by the entities supplying the information to the CTPG; or (iii) the entity supplying the information to the CTPG simply does not provide the identity of the specific generators. For example, the CTPG's Phase 4 West-of-River stress scenario used a renewable resource development portfolio that contained renewable resources in the California Public Utility Commission's ("CPUC's") "discounted core." The data the CPUC provided are shown on the spreadsheet named "CTPG_WOR_scenario_Sept9am.xls" (see the worksheet labeled "Disc_Core+Addn_SW+ProRateBestCa"), which is hosted on the CTPG website: http://www.ctpg.us/public/images/stories/downloads/ctpg_wor_scenario_sept9am.xls. It is not generally possible from this information to determine exactly which generation projects are represented.

The CTPG Technical Study Team agrees with the LSA that both installed capacity and annual energy production numbers should be provided for the renewable resources in each CREZ. This information is available on the spreadsheets posted on the CTPG website as well as in the attached spreadsheet. (See Columns D through H and Columns R through V on the worksheet labeled "Summary_model_connections".) In addition, the installed capacity and annual energy production numbers for each CREZ included in the West of River stress scenario are shown on Tables 4.7 and 4.8 of the Draft Phase 4 Study Report. Similarly, Tables C, D and E of the Draft CTPG Phase 4 Study Report contains the installed capacity and annual energy production numbers for each CREZ that was evaluated in the CTPG's analysis of the extent to which "high potential" transmission upgrades would accommodate renewable resource development without reliability criteria violations.

Comment:

Next steps for 2011: In 2011, the LSA urges the CTPG to address the remaining issues raised in LSA's earlier comments, namely:

- ***Addition of a timing element to the transmission plan.*** It is unlikely that all the high-potential projects can be built simultaneously, and the plan should prioritize those projects intended to serve generation with feasible on-line dates in the next two to five years first.
- ***Clarification of the "commercial interest" criterion.*** In addition to updating the generation projects in the Phase 4 portfolio analyses, the CTPG should provide more specific information about the CTPG members' Load-Serving Entity ("LSE") procurement plans and how the targets in them are reflected in the study scenarios.
- ***More active and explicit cooperation with other planning entities in neighboring Balancing Authority Areas and throughout the WECC*** in its further analysis of the high-potential transmission corridors.

CTPG Technical Study Team Response:

The CTPG Technical Study Team continues to believe the LSA's suggestion to consider the timing of transmission additions is relevant and CTPG will consider this suggestion as it develops its 2011 work plan. However, at some point the subject of timing becomes more relevant for the project sponsors who will actually be designing, permitting and building the upgrades that will allow California to meet its renewable resource goals, and for the respective Balancing Authorities in whose area the projects will be connected.

The CTPG's Phase 4 scenario did not include or consider Load-Serving Entity (LSE) procurement plans. In regards to LSA's reference to the CTPG members' LSE's procurement plan "targets", the CTPG is not sure what LSA means by "targets". All CTPG members are planning for a 33% RPS by 2020. As it develops its 2011 work plan, the CTPG will consider LSA's suggestion that the CTPG provide "more specific information" about CTPG member procurement plans. Note that some procurement plan information was provided in connection with the CTPG's Phase 1 work. The final Phase 1 Study Report is posted on the CTPG website at www.ctpg.us.

The CTPG recognizes that it can improve coordination with other balancing authority areas (BAAs) within California and in particular, the western interconnection. This is an active topic of discussion among the CTPG members. In furtherance of this objective, the CTPG has already made a commitment to engage with the WECC Transmission Expansion Planning Policy Committee (TEPPC) on a regular basis and expects to file its application for recognition as a WECC subregional planning group during 2011.