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**Comments of First Solar  
On the  
CTPG 2011 Phase I Work Plan  
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First Solar appreciates this opportunity to comment on the CTPG's 2011 Phase I Work plan. First Solar also appreciates the work that has been accomplished toward achieving a conceptual plan for the Load Serving Entities in achieving 33% Renewable generation in California and are encouraged by CTPG's flexibility in considering multiple scenarios to meet those goals.

First Solar recommends the following areas of study:

- **The need to use the most up-to-date RPS, Load Projections, and Net Short values.**
- **Review and modify the SCIT nomogram to reflect transmission system upgrades being constructed.**
- **Include details on timing and phasing of the large projects being proposed in California.**

**The need to use the most up to date RPS, Load Projections, and Net Short values.**

CTPG Phase 4 study concluded that "the initial set of associated 'high potential' transmission elements could potentially provide transmission capacity to avoid reliability standard violations when renewable energy is being delivered to meet a California RPS of approximately 22% to 24% in year 2020."<sup>1</sup> Yet much of the data used to derive those

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<sup>1</sup> CTPG Draft Final Statewide Plan at 9.



conclusions has been based on outdated data from the CEC IEPR 2009 forecast<sup>2</sup>. RETI generation forecast data and the Renewable Solicitation values used in developing the Discounted Core and resultant Net Short were all derived from the same data sources<sup>3</sup> collected prior to 2009. Not only does the Net Short need to be updated, as proposed in the 2011 Work plan, but commercial interest as correlated in the Discounted Core assumptions needs to be updated as well to reflect today's utilization of the major projects proposed in the plan.

The data used and resultant conclusions could have major impacts on the identification of viable renewable resource integration, least regrets and high potential transmission, and additional resource needs to achieve 33% RPS by 2020.

**Review and modify the SCIT nomogram to reflect transmission system upgrades being constructed.**

The current meter point for Path 46 and the SCIT nomogram for the Palo Verde-Devers line is at Devers Substation. With the current SCE activities to construct a new Devers-Colorado River 500 kV line, Red Bluff Substation and the Valley-Devers 500 kV line, the transmission system between the River and Devers is being strengthened substantially. As such, generation additions in the Riverside area may perform more like generation within the SCIT than resources further east.

As the SCIT nomogram can limit the utilization of transmission capacity, the structure of the SCIT nomogram needs to be rethought given transmission infrastructure additions. The current SCIT boundary is at Devers simply because that was the only point of metering of generation delivered from Palo Verde. This results in generation at Red Bluff and Colorado River being outside of the SCIT and subject to SCIT import limits. An assessment should be prepared to investigate the impacts on transfer capability if the meter point for the rated Paths and the SCIT is moved to Palo Verde-Colorado River line at Colorado River. It is time to rethink the boundaries correctly at the first metering point inside California which will be Colorado River or Red Bluff.

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<sup>2</sup> <http://www.energy.ca.gov/2009publications/CEC-200-2009-012/CEC-200-2009-012-SF-REV.PDF>

<sup>3</sup> California Energy Commission, "California Energy Demand 2008-2018,"



Therefore it is likely that the SCIT needs to be reviewed at all import points to determine if assumptions previously made on metering points, delivery points, and the nomogram include the 2020 transmission upgrade plans.

**Include details on timing and phasing of the large projects being proposed in California.**

The draft work plan *must* address these important questions of timing, permitting and schedules for each of the planned transmission upgrades between now and 2020, as well as any potential operating restrictions during construction of these upgrades, which may require existing transmission facilities to be taken out of service so that developers can plan accordingly. CTPG, as the owners of the transmission systems are the appropriate entities to provide expected scheduling of all projects inside California.

In order for that ultimate goal to be reached, CTPG members must take into account commercial realities –including, but not limited to, terms of CPUC-approved power purchase agreements (“PPAs”), the required in-service dates of transmission to accommodate those projects, their ultimate commercial on line dates, and the expiration of the ITC in 2016. This may include, if required, interim solutions to ensure sufficient transmission can come on-line and be in-service and projects deliverable by or before 2020. Renewable developers require a clear path to achieve viability and financeability, ensuring that generators with viable projects can take advantage of new transmission capacity that is constructed.

**Conclusion**

As detailed above First Solar recommends that areas of study include: (1); the use of updated and accurate RPS solicitation, Load Projections, and Net Short values, and (2) the draft comprehensive plan must modify the SCIT nomogram to reflect transmission system upgrades; and 3) the CTPG Work 2011 work plan must include proposed in-service dates, and general schedules such as permitting, start of construction, and interim solutions for all of the proposed transmission elements proposed to achieve a 33% renewable energy policy.