



Terra-Gen Power, LLC

Terra-Gen Power's Comments on CTPG 2011 Work Plan

Terra-Gen Power (TGP) appreciates the opportunity to provide the following comments on CTPG's 2011 Work Plan.

TGP supports CTPG's Stakeholder engagement process and encourages more Stakeholder involvement in the study process.

While generally supportive of the proposed study plan, TGP has specific concerns and comments with regard to the '2011 Proposed Scenarios.' By excluding the Owens Valley High Potential Corridor, the proposed plan has not taken into account the significant benefits, both in terms of renewable potential and new import capacity, which could be offered by this area.

We urge CTPG to include a scenario to account for the renewable potential of the Owens Valley area and the additional import potential of renewable projects proposed in central and southern Nevada. The details of scenario are presented below.

Owens Valley High Potential Corridor

The relevance of this scenario is due the several factors that make the Owens Valley Corridor uniquely important for renewable generation and transmission import into California. These factors include:

Renewable Potential

The RETI analysis has identified the potential for renewable generation in the Owens Valley CREZ. Recognition of the renewable potential with the identification of the transmission needed to accommodate the potential, would significantly expedite the development of in-state renewable projects in the area.

Gateway CREZ

For optimal use of the transmission infrastructure, it is best to pursue the RETI concept of 'gateway CREZ' analysis. With significant amount of geothermal and wind resource potential located in Nevada to the north of Bishop, CA, it is prudent to use a common transmission corridor that would benefit from both out-of-state and in-state renewable resources.

Import Terminus

While it is obvious that several thousand MW of renewable projects are proposed for delivery to California, the only significant path into California is the West-of-River import path. A robust transmission interconnection between Nevada and California could create an additional import path for renewable resources from the East. The proposed Esmeralda high-voltage substation in Nevada can be the north-end of such an interconnection. The transmission in Bishop, California can be developed as the South-end of the import path with an associated transmission upgrade to the load centers to the south and west of Bishop. Such an upgrade will reduce the risk of congestion along the West-of-River import path.

Resource Mix

Owens Valley area, with the local solar potential, combined with the potential of the geothermal and wind resources in Nevada offers a diverse mix of renewable resources which would significantly reduce the variability of generation sourced from the area. In addition, by establishing an import terminus in Bishop, CA, the transmission capacity can be fully utilized with imports during conditions low renewable generation.

Contact:
Dinesh Salem-Natarajan
dsn@terra-genpower.com
858-764-3744