
IEP Comments Regarding the CTPG 2011/2012 Phase I Study Plan Process & Assumptions Stakeholder Meeting, July 25, 2011

The Independent Energy Producers Association (IEP) appreciates the opportunity to provide the following comments to the California Transmission Planning Group (CTPG) with respect to its Phase I Study Plan Process and Assumptions as discussed in the July 25, 2011 Stakeholder conference call. IEP represents over 20,000 MWs of non-utility, independently owned generation resources in California. Our members are keenly interested in the results and impacts of the CTPG conceptual statewide transmission planning process. Thank you for consideration of the following comments:

Communication of Assumptions is Critical

Assumptions, and how they are employed in the CTPG's modeling, define the results. CTPG relies upon a wide array of sources for data and planning information used within its study process. Some of the data is derived from the CTPG members themselves (e.g. interconnection queues) while other material portions of the variable inputs used by CTPG are outside CTPG's origination and control (i.e. CPUC's discounted core). CTPG explains that on occasion the data available from an outside source, perhaps somewhat dated at the time of receipt, may not comport with then current knowledge about the market and regulation and thus requires modification – tweaks to bring it up to date in CTPG's eyes. As has been explained, CTPG takes into account what it believes is contemporary information that may improve the accuracy of the projections and modeling that result from the study process.

Unlike those who are ingrained in the study process (i.e. the technical experts at CTPG), efficiently gaining – and maintaining – a firm understanding of the assumptions used and all nuance associated with their deployment during the study process is a challenge to say the least. As a study process like CTPG's becomes very complex and its reporting lengthy, locating and understanding assumption-related data and rationale is frustratingly difficult if assumptions are footnotes or embedded descriptions in long narrative.

Judging from the interaction between CPUC staff and CTPG during the July 25, 2011 stakeholder meeting (as well as the July 26, 2011 meeting regarding Phase II), the driving need for clear, obvious, and complete explanations of all assumptions is a must. IEP believes that CTPG should consider the following means to properly communicate this most vital for of planning information to all its stakeholders.

IEP Comments Regarding the CTPG 2011/2012 Phase I Study Plan Process & Assumptions Stakeholder Meeting, July 25, 2011

The Assumptions Workbook

CTPG will recognize that this concept is not new. IEP has previously suggested to both CTPGs Executive and Technical Committees that a thorough, dynamic, and readily accessible accounting of the assumptions is a key to complete communications with stakeholders. While the suggestion has already been made, we realize a more concrete discussion regarding the characteristics of an envisioned Assumptions Workbook and its benefits would be of assistance to CTPG. IEP therefore offers the following ideas for consideration in this regards and hopes CTPG will take the initiative to implement an Assumptions Workbook for use in this planning process and each process to come.

IEP recommends an Assumptions Workbook with the following characteristics:

- **On-line**
 - In conjunction with the recently enhanced CTPG website, this resource would be found on or link to/from the CTPG site. Available 24/7, as needed.
- **Organized:**
 - Categorized into logical areas for ease of use & access, for example:
 - Load Assumptions
 - Renewable Resource Assumptions
 - Thermal Resource Assumptions
 - Regulatory Assumptions
 - Market Assumptions
 - etc
- **Dynamic:**
 - Updated as CTPG modifies assumptions over time, with version control so CTPG and its stakeholders know what assumptions are in use now and why. An evolving set of planning assumptions whose final versions are published with the printed report and whose descriptions are thorough
- **Current:**
 - As CTPG makes changes to assumptions, those changes are uploaded to the Assumptions Workbook in short order

IEP Comments Regarding the CTPG 2011/2012 Phase I Study Plan Process & Assumptions Stakeholder Meeting, July 25, 2011

IEP believes a resource of this nature could deliver the following benefits to all CTPG stakeholders as well as CTPG:

- Increased efficiencies:
 - Fewer stakeholder questions for CTPG to address
 - Expedited stakeholder understanding/review of reporting
 - Repeatable for each process in the future
- Improved acceptance:
 - Removes invalid conclusions by stakeholders due to lack of access/transparency
 - Likely to increase stakeholder aware
 - Lowers the probability of dissent/protest
- Enhanced communications:
 - Data push capability - address questions before asked
 - Single source reduces confusion (and CTPG overhead)
 - Ready means for required sections of the draft & final reports
 - Model for other planning bodies to access

We believe that CTPG has an opportunity to set a course from improved transmission planning and communication within California by creating and maintaining this assumptions information resource. IEP is interested in a discussion with CTPG about any questions it may have in this matter.