**California Transmission Planning Group (CTPG)**
**Technical Study Team Response to the**
**November 14, 2011 Comments of Great Basin HVDC**
**on CTPG's October 26, 2011 draft Phase 2 Study Report**

**Comment:**

[The] Calpine Sutter [generation project] desires to move from BANC [Balancing Authority of Northern California] to CAISO BAA [Balancing Authority Area] by the end of 2016 and this will have significant positive implications for Great Basin.

In summary on this issue, Great Basin HVDC recommends that CTPG management obtain the SSPG [Sierra Subregional Planning Group] studies performed by CTPG members SMUD [Sacramento Municipal Utility District] and WAPA [Western Area Power Administration] in 2011 and include them in the 2011 CTPG Final Report.

**CTPG Technical Study Team Response:**

Other than SMUD and WAPA, the CTPG Technical Study Team has not been involved in the SSPG study work. Accordingly, CTPG will not incorporate these studies in CTPG's 2011 Phase 2 study report. However, CTPG acknowledges the value of coordinating with other transmission planning groups within the WECC and intends to explore options for such coordination during CTPG's development of its 2012 work plan.

**Comment:**

On another topic, again in the spirit of not picking winning or losing projects, Great Basin HVDC notes that our path from Nevada and its injection point south of Table Mountain would result in a significantly different list of path rating overloads than the Lassen MUD [Municipal Utility District] project. Great Basin HVDC would avoid mitigation noted on Slide 52 of the November 4, 2011 presentation materials. Specifically, Great Basin HVDC would eliminate the need for Round Mountain to Table Mountain mitigation. Also, due to the Voltage Source Commutated HVDC technology which effectively functions as a Static VAR Compensator it likely would eliminate issues on the Drum to Dutch Flat path depending on how Great Basin HVDC Western Terminus is configured.

**CTPG Technical Study Team Response:**

The CTPG Technical Study Team's 2011 study work did not evaluate the Great Basin HVDC project as an alternative for accessing northwest Nevada resources. As such, CTPG does not know how the impacts of the Lassen Municipal Utility District project would differ from the impacts of the Great Basin HVDC project. However, it should be noted that as part of its 2011 study work, the CTPG evaluated a sensitivity with the Lassen Municipal Utility District project

terminated at Table Mountain instead of at Olinda/Cottonwood (refer to Slides 54 to 56 of the November 4 presentation materials). This sensitivity shows a potential overload on the Table Mountain transformer and not the Round Mountain-Table Mountain line. The Drum-Dutch Flat overload occurs with either the Olinda/Cottonwood termination or the Table Mountain termination. Potential mitigation for this overload may be a Special Protection Scheme.

**Comment:**

In conclusion, Great Basin HVDC is hopeful that not mentioning our unique, underground HVDC Sierra crossing project in the 2011 CTPG results is just an oversight since the SSPG results were not finished. Now that SSPG has reported these to WestConnect and they are available to the CTPG, it is our expectation that CTPG will include Great Basin HVDC alternative to provide stakeholders in California of the complete picture of options for an essential access path to Northwest Nevada.

**CTPG Technical Study Team Response:**

As CTPG has previously explained, CTPG has not attempted to identify or evaluate a broad range of alternatives for mitigating reliability criteria violations observed in the course of CTPG's study work. However, in the course of its 2010 study work, CTPG did solicit and evaluate stakeholder-suggested transmission alternatives. The Great Basin HVDC project was one of the alternatives evaluated by CTPG. This analysis is documented in CTPG's September 10, 2010 final Phase 3 Study Report posted on the CTPG website. See section 8.4.3.

Inasmuch as CTPG has not attempted a broad assessment of alternatives (wires or non-wires) for mitigating identified reliability criteria violations, CTPG has no basis upon which to conclude that any particular transmission infrastructure addition identified through the course of CTPG's study work is, in fact, the best solution and thereby "needed." Accordingly, CTPG takes no position on whether the infrastructure additions identified in CTPG's draft 2011 Phase 2 Study Report, the Great Basin HVDC project, or any other alternative, is best-suited for maintaining grid reliability and supporting achievement of California's public policy requirements and goals.