

Central California Clean Energy Transmission Project (C3ETP) Stakeholder Comments Matrix

Topic Area	Submitter (name and company)	Comment Submitted	C3ETP Team Response	Contact Information
General Comments	Susan Schneider, CalWEA	<p>The final study plan should:</p> <ul style="list-style-type: none"> • Clarify Reliability vs Economic Analysis assumptions; • Clarify which transmission projects are included in the 2014/2015 cases vs. the 2020/2020 cases; • Be self-contained, i.e., not say things like ISO will include X assumptions from another study - just list all the assumptions here and note where they came from, instead of making stakeholders look up multiple other documents; and • Explain the other numbers used, e.g., the 89% of generating capacity assumed for on-peak scenarios. 	<p>PG&E has addressed these comments in the Final Study Plan as follows:</p> <ol style="list-style-type: none"> 1. PG&E's Final Study Plan (http://www.caiso.com/1f7c/1f7cd79855860.pdf) has separated the Reliability assessment and economic assessment into different sections to provide greater clarity. 2. Footnote 2 on Page 9 of PG&E's Final Study Plan explains the different transmission project assumptions in the two power flow cases. 3. This comment has been incorporated in PG&E's Final Study Plan throughout. 4. This comment has been incorporated in Table 1 of PG&E's Final Study Plan. 	<p>Central California Clean Energy Transmission Project P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841</p>
General Comments	Ron Dickerson, Local Resident	<p>Question 1: What is the goal of the Central California Clean Transmission Project (C3ETP) alternatives that support pumping at Helms Pumped Storage Plant (PSP)? Does it</p>	<p>Response 1: One of the objectives of the C3ET Project is to support pumping at the Helms Pumped Storage Plant (Helms), in order to facilitate reliable</p>	<p>Central California Clean Energy Transmission Project</p>

		<p>provide access to renewable energy? (please refer to his email for “Observation” section for more input).</p> <p>Question 2: Which of the Study Plans’ 10 alternatives is the best?</p> <p>Question 3: Is the only way to integrate renewable energy into use in the San Joaquin Valley via Pumped Storage with losses accrued by a 900 MW load?</p> <p>Question 4: Where is the analysis of the net generation to the ratepayer in your studies?</p> <p>Question 5: Does the SJV and the horrendous summer time air benefit by importing renewables?</p> <p>Question 6: The PG&E representative, Mr. Ching, also stated that the Helms Gregg line was designed to support 2 units pumping and could only support 3 units pumping when the Fresno area load was at 800 MW or less. If so, why were three units originally built?</p> <p>Question 7: It was stated that the CAISO is committed to bringing the C3ETP proposal to the Board for approval in September. Is this why the examination of the alternatives is seemingly so skewed towards the Proponents’ preferred alternatives? The CAISO has been given the fiduciary task of transmission planning as an impartial entity. It is my understanding that the ratepayer also funds the reliability study. Why it necessary to rush toward that date for a project with an estimated</p>	<p>management of the electric transmission system by the California Independent System Operator Corporation (CAISO). In order to meet Renewable Portfolio Standard (RPS) targets for the state of California, the industry is significantly increasing investment in renewable resources. The current state of the electric transmission grid in California, however, cannot support this level of renewable development in light of reliability and operational concerns. The C3ET Project is critical to assist the grid in accommodating the renewable resources in both the near term and longer term. In the near term, new wind and geothermal resources will come on line in response to the need for renewable sources of energy. In particular, significant new wind and geothermal resources are expected to become available in Southern California in approximately 2013. The nature of these resources will increase the need for use of the Helms. Geothermal resources are base load resources, and wind resources are intermittent, off-peak resources. This resource mix, in combination with existing base load</p>	<p>P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841</p>
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		<p>45 year life or greater?</p>	<p>and other resources that must be kept on line to meet peak load, is expected to result in minimum load and over-generation problems during off-peak periods. The ability to operate Helms in the pumping mode will be critical to balance the system during off-peak hours. In addition to facilitating CAISO management of the system off-peak, Helms pumping will increase the availability of Helms generation during on-peak hours, which will support local peak requirements in the Yosemite and Fresno area, which the CAISO has identified as a load pocket in its 2008 Local Capacity Requirement study. Operation of Helms in the pumping mode is currently limited by current Fresno/Yosemite area off-peak load and constraints on the Fresno area transmission system and the ability to use resources in southern California for such Helms operation can also be constrained by Path 15. The C3ET Project will alleviate expected transmission capacity constraints on Path 15, increase transmission capacity into the local area to meet Yosemite and Fresno area on-peak demands, and increase capacity to meet off-peak demands, allowing full</p>	
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			<p>utilization of Helms.</p> <p>In the longer term (2022 and beyond), the California Energy Commission has forecast significant solar (on-peak) resources to come online in Southern California. The magnitude of these solar resources is expected to shift the location of on-peak resources from Northern to Southern California. The resulting increased imports from Southern California to Northern California (and accompanying decrease in north to south scheduled energy) is likely to create Path 15 south-to-north congestion and further increase the power flowing into Fresno area to supply the local peak load. The C3ET Project will alleviate this congestion by increasing the capacity of the south-to-north transfer and increase transfer capability into Fresno area.</p> <p>In addition to the C3ET Project, PG&E is involved in other projects designed to encourage development of renewable energy (including solar resources) and is partnering with its customers to promote conservation of energy. Not every project, however, will satisfy the need to maintain system reliability.</p> <p>Response 2: The purpose of the</p>	
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			<p>CAISO Study is to determine which of the alternatives set forth in the Study Plans address reliability and economic concerns in order to determine the optimal transmission planning solution for the identified system needs. As a part of determining the assumptions and base cases for the Study, PG&E and the CAISO have and will consider a wide variety of alternatives, including transmission, generation, and combination projects (such as large scale solar generators and upgrades to existing distribution or transmission facilities), to evaluate which projects are feasible and could meet the needs of the system in light of projected system conditions.</p> <p>Response 3: No. The need for Pumped Storage is described in the CAISO's Integration Renewable Resources Report posted on our website: http://www.caiso.com/1ca5/1ca5a7a026270.pdf</p> <p>Response 4: The Economic Assessment, a study to be performed, is going to analyze the incremental impact of the proposed C3ETP alternatives to the ratepayers.</p> <p>Response 5: The CAISO does not</p>	
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			<p>have particular expertise regarding air quality, but to the extent that local generation in the SJV area is displaced by imported renewable resources, it is reasonable to expect that air quality would be incrementally better.</p> <p>Response 6: All three Helms pumps can be utilized during very light load hours, but it is constrained to a very short period of time. During that time, all three Helms pumps are utilized. In addition, all three machines also function in the generation mode and are available for use during hours when they are not in the pump mode.</p> <p>Response 7: The CAISO will not decide on the C3ETP project until an adequate alternative analysis has been completed. There are issues with the electrical system in the Fresno area that need to be addressed. While the C3ETP is the proposed project, the California ISO is also looking at several alternatives to determine which one best meets the needs of the area. Based on the analyses that are not yet finished, the ISO staff will make a recommendation to our Board of Governors. It is our intention to make that recommendation and ask for our Board's approval in September. C3ETP</p>	
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			is described as “the preferred” alternative—from PG&E’s perspective. Not the California ISO’s. The analyses are being conducted, and the final recommendation will be made in the context of the C3ETP project— However, the ISO does not yet have a recommendation.	
General Comments	Joyce Berube, Local Resident (realtor)	<p>SAVE THE FOOTHILLS MEETING THURS. JUNE 26th at BEAR MOUNTAIN LIBRARY 6:30 PM IN ATTENDENCE ; PG&E CALFIRE</p> <p>WE WILL GET ANSWERS TO OUR UNANSWERED QUESTIONS!!</p> <p>PLEASE FORWARD TO ALL- SEE YOU THERE- BRING YOUR NEIGHBORS!! As of todays Date PG&E is attempting to NOT ATTEND this mtg although they had notification of such on May 28th. -- Thank You, Joyce Berube 332-2881 weekdays www.savethefoothills.org</p>	PG&E regrets that it is unable to attend Ms. Berube's meeting. PG&E had notified Ms. Berube of the C3ET Project in 2007 and had a follow-up phone conversation with her on December 22, 2007, to discuss the project. At that time, we informed her that if she had additional questions we would meet with her to address them. Ms. Berube did not raise any additional questions to PG&E during that phone call or subsequently to the C3ET project voicemail or mail box. After Ms. Berube expressed concerns to the California Public Utilities Commission, PG&E met with Ms. Berube again on June 3, 2008. During that meeting, Ms. Berube informed us that she had scheduled a public meeting for June 26, 2008. As PG&E had not been consulted prior the scheduling of the meeting, the C3ET Project team was	Central California Clean Energy Transmission Project P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841

			<p>unable to rearrange their schedules to attend. Instead, we suggested to Ms. Berube that we meet in late July.</p> <p>Over the past year, PG&E has participated in numerous meetings at the request of members of the public, both in small "one-on-one" settings and in larger group meetings. PG&E continues to be willing to meet with members of the public who want to discuss the C3ET Project. In order to ensure that the appropriate C3ET Project Team members can attend meetings and answer your questions, please contact the C3ET Project Team at 1-800-442-0841 in advance to discuss potential dates and the general scope of proposed meetings.</p> <p>The C3ET Project team will work with Ms. Berube to schedule a future meeting.</p>	
General Comments	Charles M. Ahsley, Watts Valley Preservation Society	Does not want E2 Substation to be built on his property or near his property.	The CAISO Study process is intended to evaluate the optimal transmission planning solution for an identified system need, without regard to route. Once the CAISO approves a particular transmission plan of service for addition to the grid in light of transmission planning concerns, such	Central California Clean Energy Transmission Project P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841

			<p>as reliability and economics, the CPUC will determine the best route for the project following a detailed environmental review and public participation process, which will consider biological, environmental, cultural, aesthetic, and other land-use issues.</p>	
Project Inquires	Susan Schneider, CalWEA	<p>In view of this latest information, and additional helpful clarifications provided by PG&E staff, we request that PG&E include the following clarifications about the Canada/Northwest-to-northern California line in its Final C3ETP Study Plan:</p> <p>This conceptual project is included in the study because it is in PG&E's current 10-year transmission plan; however:</p> <ul style="list-style-type: none"> • Inclusion in the C3ETP study does not constitute a proposal to build this line or assumption that it will actually be built, nor does it prejudice whether the 26% of California renewable energy not provided by southern California/Southwest sources would come from Northern California or Northwest/Canadian sources; and • In any case, whether the power comes from Northern California or Northwest/Canadian generation will 	<p>Foot note 2 of PG&E's Final Study Plan addresses questions regarding the use of the line to Canada project in the reliability study:</p> <p>"In addition to the approved projects shown in Attachment 2, the 2022 summer peak base case will also model the following two major regional conceptual transmission projects that are still under preliminary evaluation and have not received approval by either PG&E or the CAISO; Canada/Pacific Northwest – Northern California Transmission Project and Bay Area Bulk Transmission Project. These two conceptual projects were documented in PG&E's 2007 Electric Grid Expansion Plan and are currently in the WECC Regional Planning Phase. Both conceptual transmission projects will have negligible impact on reliability analysis for the C3ET Project. Since they are non-approved projects, only preliminary project scopes will be considered in the study. The Canada/Pacific Northwest – Northern California Transmission Project will be represented as a renewable resource connected directly at Tesla. The origin of the renewable energy thus represented could be from the northern California, the Pacific Northwest, Canada, or</p>	<p>Central California Clean Energy Transmission Project P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841</p>

		<p>have no material impact on the C3ETP analysis results.</p> <p>We offer this compromise in consideration of our overall support for the C3ETP project, without waiving, in any way, CalWEA's rights to question the need for a Canada/Northwest-to-Northern California line in the future, if or when it is proposed for ISO and/or CPUC approval.</p>	<p>northeast region of the WECC.”</p> <p>With regard to implications beyond the scope of the C3ET Study, please see the responses to other comments by CalWEA regarding the line to Canada project.</p>	
Project Inquires	George and Sandee-Sage Butts, Local Resident	<p>Dear Sir;</p> <p>Can you please send me the exact pathway your Alt2 PG&E 550kv Towers will take, specifically the corridor going through Squaw Valley. I am a resident there and would like to know if the towers will be located behind or through my property. My address is_____.</p> <p>George and Sandee-Sage Butts</p>	<p>The California ISO (CAISO), Pacific Gas and Electric Company (PG&E) and Southern California Edison (SCE) are conducting transmission planning studies for the C3ET Project. This process considers a proposal and several alternatives from an electrical interconnection standpoint and it does not result in potential routes for the Project. Once the CAISO has approved a particular transmission plan of service for addition to the grid in light of transmission planning concerns, the California Public Utilities Commission (CPUC) will evaluate and approve the best route for the project among a range of alternatives that it will develop and evaluate based in part on public input.</p>	<p>Central California Clean Energy Transmission Project P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841</p>

			<p>The CAISO administers the transmission planning study in an open stakeholder process. The study focuses on electrical properties of the grid rather than siting and routing. At the end of the study, the recommended alternative will be proposed however with no determination of the routing for the C3ET Project.</p> <p>Currently, PG&E is working on a proponent's environmental assessment and expects to file for a Certificate of Public Convenience and Necessity (CPCN) at the CPUC in 2009. Information on the C3ET Project is available on the web at http://www.c3etproject.com, and information on the CPUC process at ftp://ftp.cpuc.ca.gov/puc/energy/environment/cpcnprocess.doc. Questions regarding the studied corridors or potential routes, should be directed to the Central California Clean Energy Transmission Project contact information.</p>	
Comments on Study Plan Assumptions	Susan Schneider, CalWEA	CalWEA has a specific concern with respect to the Base Case transmission assumptions. As stated in the draft Plan, ISO practice (per ISO Grid Planning Standards) is to include	The CAISO's Planning Standards do not appear to require, without exception, the inclusion of only "transmission projects in planning	Central California Clean Energy Transmission Project

		<p>transmission projects in planning studies that have received ISO approval. However, the Plan proposes to include a transmission project that has not yet gone through an ISO stakeholder process, much less received ISO approval – a major Canada-to-northern California transmission line. PG&E stated they cannot meet the 33% Renewable Portfolio Standard (RPS) target for 2020 without this line to Canada. However, PG&E has not demonstrated that it cannot meet this target with California or western U.S. renewable resources; for example the ISO has pointed out on numerous occasions that there is far more renewable generation in the ISO generation interconnection queue already than California needs to meet RPS needs.</p> <p>Thus, PG&E’s claim should be tested and discussed further before the ISO makes the proposed major exception to its planning-studies guidelines.</p>	<p>studies that have received ISO approval.” It would facilitate our understanding and ability to respond to this inquiry if Ms Schneider would provide the exact citation in the CAISO Planning Standards to which she refers.</p> <p>Moreover, please see the responses to other comments by CalWEA regarding the line to Canada project.</p>	<p>P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841</p>
<p>Comments on Study Plan Assumptions</p>	<p>Susan Schneider, CalWEA</p>	<p>Can PG&E meet the 33% Renewable Portfolio Standard (RPS) target for 2020 without this line to Canada? If not, won't the renewable generation in the CAISO Generation Interconnection Queue take care of the RPS needs?</p>	<p>The transmission line to Canada is not a part of the C3ET Project. The C3ET Project Study results do not rely upon the existence of the proposed line to Canada or assume that it will be constructed. The C3ET Project Study uses the line to Canada as a proxy for generation coming into the system from</p>	<p>Central California Clean Energy Transmission Project P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841</p>

			that general area and from other parts of northern California. The results of the C3ET Project are not intended to address and will not indicate whether the line to Canada is needed for economic or reliability purposes. There are and will continue to be opportunities to comment on issues relating to the line to Canada project in various forums.	
Comments on Study Plan Assumptions	Mark Hesters, CEC	If possible, make the reliability and economic study years consistent. The study plan indicates that the reliability analysis will study 2014 and 2022, while the economic analysis will study 2015 and 2020. The economic study will also discount the 2020 results over a 40-year project lifetime. If the 2022 reliability study results are dependent on the inclusion of a PG&E Canada/Pacific Northwest to Northern California transmission line or specific upgrades in the San Francisco Greater Bay Area and those projects are not included in the 2020 economic study, the results of the 2020 study could be questioned, especially as they are spread out over the life of the project. Using different study years also means developing four, rather than two, renewable resource forecasts.	(Response provided during 2/6/08 stakeholder meeting.) The development of these different models require the participation of practically every electric utility in the Western United States and Canada. Therefore, we can only afford to produce a handful of them. However, even though the reliability model represents the year 2014 and the economic model represents 2015, the critical transmission and generation assumptions will be consistent. Differences such as the conceptual line to the Northwest can be addressed by sensitivity studies, if necessary. Load growth differences can be adequately corrected by interpolation	CAISO Regional Transmission regionaltransmission@caiso.com
Comments on Study Plan	Mark Hesters,	The C3ETP project would significantly affect off-peak power flowing from Southern	The CAISO appreciates CEC's insights into the correlation of PVD2 and C3ET	

Assumptions	CEC	<p>California to Northern California; sensitivities and scenarios need to focus on those assumptions that have the greatest impact on these off-peak flows.</p> <ul style="list-style-type: none"> • The mix of renewable resources in Southern California could affect the economics of the C3ETP project. Wind generation tends to provide more off-peak power than central station solar so the C3ETP benefits could be sensitive to the assumption about which types of renewable resources are used to meet the Renewables Portfolio Standard in Southern California. Data used in the coordinated CPUC/California ISO resource adequacy process shows manor wind variations over the months of the year as well as across hours of the day. We expect that central station solar would be more predictable. • It was our understanding from SCE's CPCN application for Devers –Palo Verde 2 (DPV2) that the project was not expected to provide a significant amount of on-peak energy and was primarily justified by the off-peak energy it could bring in to Southern California. Since the C3ETP would also primarily increase off-peak transfer capability from Southern California to Northern California, it appears that a DPV2 	<p>projects during off-peak conditions. The CAISO agrees with CEC's suggestion to perform a sensitivity analysis in the Economic Assessment to study the impact of not having PVD2 line.</p>	<p>CAISO Regional Transmission regionaltransmission@caiso.com</p>
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		sensitivity for the C3ETP project is required.		
Comments on Study Plan Assumptions	Mark Hesters, CEC	California. Energy Commission staff recommends that studies assume that OTC plants in areas with Local Capacity Requirements (LCR) continue to run throughout the study period. The OTC plants not in LCR areas should be assumed retired	The CAISO agrees with CEC on this point. In absence of conclusive results from the OTC study, it is a fair assumption that PTC plants not in LCR areas would be retired. In the Economic Assessment, the sensitivity analysis on OTC retirement will be based on this assumption.	CAISO Regional Transmission regionaltransmission@caiso.com
Comments on Study Plan Assumptions	Mark Hesters, CEC	Energy Commission staff historical analyses of the effect of multiple drought years on hydroelectric capacity in California does not agree with California ISO drought year hydroelectric capacity assumptions shown in Attachment 4.	The drought year hydro pattern was developed for a <i>partial</i> peak system condition. The CEC historical analyses were on hydro pattern at the time of peak. The study plan was clarified to state specifically that the drought year sensitivity study will be based on hydro generation pattern under summer partial-peak conditions.	Central California Clean Energy Transmission Project P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841
Comment Regarding Sensitivity Studies	Mark Hesters, California Energy Commission (CEC)	Sensitivity studies are a critical part of a thorough analysis and at the first stakeholder meeting for the C3ETP held at the California ISO on January 9, 2008 it appeared that the California ISO would only be analyzing project benefits under a fairly limited number of sensitivities and was not open to including additional sensitivities because of the amount of time it takes to analyze them. Because the California ISO's analysis is essentially the primary project analysis for the state of	The CAISO agrees with CEC that sensitivity studies are a critical part of a thorough analysis. In agreement with CEC's suggestions, the CAISO will include the following sensitivity studies: <ul style="list-style-type: none"> • PVD2 Alternative renewable portfolio (that will also address the impact of renewables mix due to conceptual transmission line from Pacific-Northwest to Northern California.)	CAISO Regional Transmission regionaltransmission@caiso.com

		<p>California, Energy Commission staff does not believe that limiting the analysis because of staffing limitations is appropriate. If the forecasted C3ETP benefits could be significantly affected by a specific assumption such as whether or not the Devers – Palo Verde 2 project is built or even a very preliminary PG&E Canada/Pacific Northwest to Northern California transmission line is operating, then the study needs to include an analysis of whether or not the benefits are affected by these assumptions. Rather than limit the thoroughness of the study due to staffing or resource constraints, we encourage the California ISO to explore collaboration with other agencies, such as the Energy Commission, as a way to access needed staff resources.</p>		
<p>Comment Regarding Sensitivity Studies</p>	<p>Susan Schneider, CalWEA</p>	<p>The slides at the February 6 stakeholder meeting mention a possible sensitivity case without the Canada/Northwest-to-northern California transmission line, in response to our January 23rd comments, but no other details were provided; moreover, this sensitivity study is not mentioned at all in the latest Study Plan.</p>	<p>This sensitivity study is included in the Sensitivity Section. The plan would be to study a renewable resource scenario that assumes replacing the renewables import from the Northwest with increased renewables imports from southern California.</p>	<p>Central California Clean Energy Transmission Project P.O.BOX 27918 Fresno, CA. 93729-7918 Phone: 1-800-442-0841</p>
<p>Comment on C3ETP Alternatives/ Alternative</p>	<p>Susan Schneider, California Wind Energy</p>	<p>One alternative that should be considered is extended, off-peak-hour operation of the CTs that are already included in the base case. If that generation is needed to meet Helms</p>	<p>In Economic Assessment, generators dispatch is driven by LMP. In peak, shoulder-peak and even off-peak conditions, when the Fresno import</p>	<p>CAISO Regional Transmission</p>

Suggestion	Association (CalWEA)	pumping and other off-peak loads, the LMPs under MRTU would be high in those hours, and possibly high enough to support the additional hours of operation.	<p>lines are constrained, there will be high LMP in Fresno and dispatch-able generators (including CTs) will be automatically dispatched to relieve congestion.</p> <p>As off-peak elapses, load gradually drops and Fresno import constraints will go away. At this time, the Fresno LMP will drop to normal level and may warrant Hemps pumping.</p> <p>Generally, peaking units and pumped-storage do not run at the same time during off-peak. In other words, peakers do not supporting Helms pumping.</p>	regionaltransmission@caiso.com
Comment on C3ETP Alternatives/ Alternative Suggestion	Southern California Edison (SCE)	SCE has recently conducted a planning assessment of the Big Creek Corridor to identify potential long-term transmission reliability needs to serve load. The study concluded that 230-kV transmission plans for the Big Creek Corridor (including possible SCE/PG&E 230-kV tie options) are not adequate. A strong and reliable 500-kV source is needed for continued reliability of service to SCE SJV area load. A SCE/PG&E 500-kV tie in general can be an effective alternative. Form regional planning prospective, SCE concluded that all the alternatives presented are insufficient to meet	<p>(Response provided during 2/6/08 stakeholder meeting.)</p> <p>PG&E incorporated the two modified alternatives into their study plan, and the ISO began working with SCE to include an analysis of load service for SCE's SJV load growth, within the C3ETP process.</p> <p>In addition, the Economic study is being expanded to incorporate both PG&E's and SCE's needs</p>	CAISO Regional Transmission regionaltransmission@caiso.com

		regional needs.		
Comment on C3ETP Alternatives/ Alternative Suggestion	SCE	SCE proposes “Alternative 2a” to be studied. This includes the construction of an additional 500/230-kV “AA: substation (near the junction of SCE Cross Valley Project) and looping in one of the C3ETP 500-kV lines to feed that substation. The 230-kV side of the substation would connect to the existing SCE 230-kV lines in the Big Creek Corridor. SCE believes that this modification to Alternative 2 would result in a coordinated regional transmission plan that would help meet system needs in the most rational, orderly, and cost-effective manner possible. SCE will provide details of this alternative to CAISO when requested.	Same as above	CAISO Regional Transmission regionaltransmission@caiso.com
Comment on C3ETP Alternatives/ Alternative Suggestion	SCE	SCE proposed “Alternative 4a” to be studied. This includes the SCE “AA” Substation (as in alternative 2a), Magunden 500/230-kV Substation with 500kV lines to Midway, Whirlwind, SCE AA Sub and E2. This alternative will: <ul style="list-style-type: none"> • Provide all the benefits listed for “Alternative 2a”; • Complete the fourth “Midway-Vincent” line with significant increased capacity on Path 26; Provide an additional 500-kV source to inter-connect SCE and PG&E systems in the vicinity of Magunden Substation	Same as above	CAISO Regional Transmission regionaltransmission@caiso.com

		for reliability service to the PG&E and SCE load. SCE will provide details of this alternative to CAISO when requested.		
Comment on C3ETP Alternatives/ Alternative Suggestion	Mark Hesters, CEC	The 565 MW generation alternatives to the project appears arbitrary. Since the C3ETP is adding more than 1,000 MW of transmission capacity to Path 15 wouldn't using a similar amount of generation be a better comparison? If 565 MW is the best size for a generation alternative, please explain why.	The 565 MW generation is according the currently available information from the LGIP queue. It is a new generation project being studied under the LGIP. For C3ETP, it makes sense to be more general and representative. Per stakeholder comments, Alternative 10 is modified to 1,000 MW, with 600 MW combined cycle connected McCall substation and 400 MW solar to Borden Substation.	CAISO Regional Transmission regionaltransmission@caiso.com
Comment on C3ETP Alternatives/ Alternative Suggestion	Jim Richards, Kings River Conservation District (KRCD)	Please address the alternative of supporting Helms Pump-back operation with San Joaquin Valley sited solar generation, which would enhance the local economy while reducing the need for infrastructure to import energy from Southern California. This could be considered as a part of your alternative No. 10 which provides for 600 MW of local generation connecting at McCall Substation.	Alternative 10 has been modified from 565 MW to 600 MW for new combined cycle generation at McCall Substation. Additionally, according to this suggestion, 400 MW of solar generation at Borden substation is also added to reflect the trend of renewables development in San Joaquin Valley. Note that solar generation delivers minimum or no output during off-peak period. Therefore, it shall have limited or no impact of supporting Helms pump operations.	CAISO Regional Transmission regionaltransmission@caiso.com

<p>Comment on C3ETP Alternatives/ Alternative Suggestion</p>	<p>Ron Dickerson, Local Resident</p>	<p>Question 1: Would the CAISO clarify if SCE has added the 2-D alternative to its Reliability Assessment? Question 2: Is it currently the CAISO or the Participating Transmission Owners position that the Western Corridor is not a viable option to serve the SCE system? It is my understanding that PG&E is currently investigating, and has added modifications to the Western Corridor of the C3ETP. Question 3: Has the CAISO or the PTOs evaluated the current Western Corridor viability to serve the SCE system? Question 4: Can PG&E's 2d Midway Gregg alternative mitigate the Transient Stability issues identified by the SCE Reliability Assessment of 4-24-08 ? Question 5: 1. As I summarize the results of the Preliminary Reliability Assessment study, only Alternative 2d meets all Goals (1-4) of the study plan. Would the CAISO concur? At the April 24, 2008 stake holders meeting, the issue of; Alternative 2d Midway-Gregg 500kv DCTL (170mile)Preliminary Study Results-Transient Stability Analysis shows oscillation and poor damping. A more detailed analysis would be needed. 2.Has this "detailed analysis" been performed? 3.Can the oscillation and poor damping be mitigated? 4.Is 170 miles the accurate distance that the preliminary analysis</p>	<p>Response 1: This alternative consists of Midway – Gregg 500 kV DCTL and Magunden – S1 230 kV DCTL. The SCE Reliability Assessment already covers this scenario, which is named "Alt. SCE-1". Response 2: The western corridor alternative by itself would not provide an opportunity to create a new electrical source to the SCE San Joaquin valley load area. Therefore additional transmission facilities would be required in addition to the western corridor in order to reliably serve the SCE load. The identification of these additional facilities is part of the scope of the ongoing studies. Response 3: The CAISO does not have jurisdiction on siting and routing transmission facilities. The CAISO focuses on the electrical properties of transmission line that delivers power from point to point. Response 4: As stated in Item #1, Alternative 2d is "Alt. SCE-1" (Magunden – Rector 230 kV DCTL). The Reliability Assessment is still under way and has not reached any conclusion if the alternative can mitigate transient stability issues on the SCE transmission system.</p>	
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		<p>was based upon? 5. Does this assume an east or west route? 6. Assuming that this issue can be mitigated, would the CAISO comment on the following perceived benefits of the 2d alternative: 1 thru 5.</p>	<p>Response 5: The analysis on Alternative 2D is part of the study plan and we will address these questions in the Preliminary or Final Report.</p>	
Upgrade Suggestion	Susan Schneider, CalWEA	<p>The ISO and PG&E should very seriously consider including an upgrade of the PG&E Midway-Vincent #3 line, i.e., conductors to make its ampacity at least equal to the ampacity of the SCE portion of the same circuit. This upgrade was mentioned in the Tehachapi Transmission Plan as a “low-cost upgrade” enabled by the Tehachapi improvements.</p> <p>Among other major benefits, this upgrade will prevent Path 26 from becoming the next bottleneck in the ISO grid, once the C3ETP relieves the Path 15 south-to-north bottleneck. It would be best to match the capability of both these lines, to increase operational flexibility throughout the state. The upgrade could also alleviate the current problems meeting 30-minute contingency requirements in the south that require out-of-market dispatches in the south, to leave Path 26 capacity open for contingency events,</p>	<p>Alternative 2d has been added according to this comment. Alternative 2d will be Alternative 2 (Midway – E2 500 kV DCTL) plus the upgrade of Midway – Vicent 500 kV #3 line.</p>	<p>CAISO Regional Transmission regionaltransmission@caiso.com</p>

Request Window Projects Related	Susan Schneider, CalWEA	It is completely unclear which PTO-proposed projects are supposed to go through the Order 890 request window (if any) and which ones won't. PG&E has not requested approval for this project, yet apparently it will bypass the request window completely, and the responses to questions at the C3ETP meeting implied that all the 40-50 projects listed as potential future proposals would also be exempt. If that's the case, you might as well say that PTO projects are simply exempt, because nearly all the economic projects will have at least some reliability element, and most major future projects are already on that list.	We understand and have acknowledged at our stakeholder meetings, that the implementation of the request window will, initially, be confusing until it is fully implemented. Transitioning from one process to another is always difficult, especially in one as complicated as our new planning process. Our new process was fully implemented at the beginning of this year; this includes the implementation of the request window. As envisioned, the request window was developed to provide an opportunity for any stakeholder to propose projects or ideas that would provide economic benefits to the overall system. We would acknowledge that you understand the "why" of the request window; but it is of great importance to us that you understand that it is not a "toll gate" for certain stakeholders to navigate while others, such as the PTOs or CAISO, get to bypass. We believe that FERC was very clear in what it intended the CAISO to do, which is to provide all stakeholders access to our planning process. As such, after December 31, 2007, everyone must submit their proposals	CAISO Regional Transmission regionaltransmission@caiso.com
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			<p>or ideas for economic projects through the request window, including the PTOs and CAISO. Looking backward from December 31, 2007, the CAISO chose to implement the transition by grandfathering all current and proposed economic projects documented in previously approved transmission plans. The C3ETP project falls into this category. A "request for approval" for any project is unnecessary for it to enter the request window as the CAISO assumes that its sponsor submits it, they intend to seek CAISO approval.</p> <p>With regard to the reliability versus economic test, we believe the NERC/WECC standards are quite clear on the determination of "reliability". While the exact identity of the 40 to 50 projects referenced is unknown, it is assumed that they have a demonstrated need based on the application of the NERC/WECC standards. As such, by our request window definition, they are not required to go through the request window.</p>	
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