

Stakeholder Comments on 2013/2104 Preliminary Reliability Study Results and Proposed Reliability Solutions

Submitted by	Company	Date Submitted
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Critical Path Transmission thanks the CAISO for the opportunity to submit stakeholder comments on the 2013/2014 preliminary reliability study results and proposed reliability solutions.

Critical Path reminds the CAISO that there is a significant possibility that the Coolwater-Lugo CPCN application will be denied by the CPUC for a variety of reasons. Given this real prospect and the general consensus that

1. there is a need for transmission infrastructure in the region,
2. the CAISO has determined that AV Clearview Project is, from an electrical and reliability perspective, a viable alternative to the Coolwater-Lugo project and
3. any delays in building needed infrastructure in the region is not in the best interests of the CAISO, the generator community or in meeting California's RPS goals,

Critical Path recommends that the CAISO either continues the separate AV Clearview Project study that is part of the 2012/2013 Transmission Planning Process or includes AV Clearview as a "contingency alternative project" in the 2013/2014 Transmission Planning Process should Coolwater-Lugo not move forward at the CPUC. In such a contingency, the CAISO should be prepared to initiate a process for including a Coolwater-Lugo alternative in the Transmission Plan without delay.