The Division of Ratepayer Advocates (DRA) of the California Public Utilities Commission offers these comment on the 2012 -2013 Transmission Planning Process - Renewables Portfolio Assumptions Meeting 4/2/2012.

1. CPUC and CEC staff presented and proposed four portfolios, Cost, Environment, Commercial Interest and High DG. CPUC and CEC Staff proposed the Cost Case be used as the Base Case in the 2012 - 2013 Transmission Planning Process.

DRA agrees that the Cost Case should be the Base Case for the 2012 - 2013 Transmission Planning Process.

DRA has no concerns with the other three cases being run as sensitivity studies.

2. In the CAISO portion of the presentation, CAISO Staff pointed out that, in accordance with it's FERC approved tariff, the CAISO alone is responsible for development of cases to be run in its Transmission Planning Studies. Should the CAISO make any changes to the four portfolios presented and proposed, DRA requests that the CAISO notify stakeholders of what specific changes were made and why the changes were considered necessary from the CAISO perspective.

Thanks again for the opportunity to comment.

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