

Stakeholder Comments Template

**Integration of Transmission Planning and Generation
Interconnection Procedures (TPP-GIP Integration)
Revised Straw Proposal, September 12, 2011**

Submitted by	Company	Date Submitted
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Desert Southwest Power, LLC (“DSP”) submits these comments on the September 12, 2011 Revised Straw Proposal for Integration of Transmission Planning and Generation Interconnection Procedures (“TPP-GIP Integration”) Straw Proposal (“Revised Proposal”). DSP is the owner of the Desert Southwest Transmission Project (“DSWTP”), a part single-circuit and part double-circuit 500 kV transmission line that will bring renewable and other energy into the load pocket areas in Southern California. As DSP has noted in previous comments to staff, DSP has made significant progress through virtually all levels of the siting process for a new independently owned transmission project. DSWTP has all of its environmental and land use permits and has been approved for cost recovery by FERC. DSP has repeatedly urged the CAISO to consider these unique circumstances and provide some mechanism in the RTPP or through an alternative process that will not further delay the project by awaiting final Board approval of the comprehensive plan. DSP briefly reiterates its concerns here and directs CAISO staff to its previous filing on the July 21st Straw Proposal, where DSP set forth a strategy for expedited approval of pipeline projects like DSWTP. DSP requests that the CAISO expressly acknowledge the concerns of independent transmission developers about certainty and timing in the next version of the Straw Proposal and provide greater detail on how projects from previous TPPs can be expedited.

On Page 8 of the Revised Proposal, the CAISO notes stakeholders’ comments about the need to expedite the *interconnection* process. However, the proposal is unclear as to how that comment has been addressed. Moreover, expediting the interconnection process is only part of stakeholders’ concerns about certainty. The CAISO has not recognized stakeholders’ stated concerns about the need to provide expedited approval of projects that were submitted in previous versions of the TPP. DSWTP is one such project.

DSWTP is an independently owned transmission project that was initiated in 1999. DSWTP will facilitate interconnection of more than 7,000 MW of solar projects, and up to 1,500 MW of additional import capability. DSWTP received the necessary Rights of Way from the Bureau of Land Management in 2007, and most recently conducted cultural surveys for the 110 miles from Colorado River Station to Devers. In addition to its environmental approvals,

DSWTP has been studied in collaboration with SCE, proposed as the next project after SCE's DPV2, and recently received approval for rate recovery from FERC. DSWTP is one of the few transmission projects in the region that has reached such an advanced permitting stage and can be predictably constructed in the near-term. DSWTP is an example of a project that is clearly needed, and is "low hanging fruit" for the CAISO's approval.

On November 30, 2009, DSP submitted DSWTP in the Open Request Window of the CAISO's TPP. DSWTP has not yet been approved by the CAISO and will apparently rely on the 2011-2012 RTPP to provide that approval. DSP requests that the CAISO allow for expedited approval of pipeline projects that can demonstrate significant permitting progress, like DSWTP. DSP welcomes the opportunity to provide additional detail on how staff could provide this expedited approval for pipeline projects.