

**Center for Energy Efficiency and Renewable Technologies**  
**Comments on 2011/2012 Conceptual Statewide Transmission Plan Update,**  
**September 28, 2012**

Submitted by:	Company	Date Submitted
David Miller <a href="mailto:david@ceert.org">david@ceert.org</a> 916-340-2638	Center for Energy Efficiency and Renewable Technologies	October 22, 2012

The Center for Energy Efficiency and Renewable Technologies (CEERT) appreciates the opportunity to comment on the CAISO's 2011/2012 Conceptual Statewide Transmission Plan Update of September 28, 2012. While this plan reflects a tremendous effort across multiple agencies, CEERT is concerned that this plan does not adequately reflect adequate stakeholder involvement. The CAISO states that this conceptual plan is based on collaborative work with the transmission planning entities participating in the CTPG. However, CTPG is comprised of California Balancing Authorities and IOUs only, with only indirect input from developers as reflected by the CPUC discounted core and related transmission scenarios, and no direct input from environmental interests. We believe this lack of a robust stakeholder input will not lead to the most efficient development of transmission resources in support of California's aggressive GHG reduction goals. Lack of early involvement in the planning process with a diverse group of stakeholders may miss critical issues that can then result in litigation and unnecessary delays. It is in the best interest of the CAISO and California ratepayers to develop a robust stakeholder involvement plan.

CEERT is also concerned that the CAISO proposal seems to be developing transmission assets that support the entire renewable net short. The renewable net short (RNS) is defined as the amount of new renewable generation necessary for LSEs to meet or exceed the renewable energy targets. The process for calculating the net short includes forecasting the renewable target and then subtracting the renewable supply forecast. CEERT is concerned that renewable distributed generation including FIT, RAM and NEM goals as well as uncommitted energy efficiency and demand response may not be accurately included in this calculation. Ignoring these potentially significant contributions the renewable net short may lead to excess transmission being built, leading to the possibility of stranded assets and increased ratepayer risk.

CEERT fully supports the CAISO in developing regional and inter-regional coordination with other balancing authorities. While we recognize that this conceptual statewide transmission plan is not the main venue for addressing these concerns, we support the CAISO proactively engaging in transmission planning outside of its borders.

In the remainder of these comments we address specific transmission components in this plan:

**Helms**

CEERT supports the incremental transmission assets included in the conceptual plan that may provide additional access to valuable storage assets located at the Helms pumped storage facility. However, we are concerned that the incremental transmission capacity included in this plan may not be sufficient to fully access Helms. For example, a transmission asset developed at Midway – Gregg could provide additional access to underutilized pumped storage capacity, and would also have the benefit of supporting the development of renewable assets located within the Westlands water district. Regardless, we would like to insist on having a plan for more complete Helms access included in the conceptual transmission plan.

**Westlands**

The Westlands water district encompasses environmentally degraded land with high solar insolation. For these reasons we believe it represents a region of high value for developing renewable assets. CEERT believes Westlands should be supported by transmission access. While San Joaquin area upgrades are included in the plan, it is not clear whether sufficient transmission assets are planned to incorporate renewable assets at the Westlands water district.

**DRECP / West Mojave**

CEERT encourages the CAISO and the CTPG to engage more fully with the DRECP planning process and to consider alternative DRECP proposals in developing their conceptual transmission plan. As the DRECP continues to be developed, the West Mojave and Riverside East (barring a solar tax) as well as the Imperial Valley are emerging as major renewable energy development areas. Transmission to the DRECP should be developed to support these areas in a manner that supports long term build out of these areas.

Given the work of other planning bodies on GHG law, critical infrastructure needs to be developed in order to support longer term objectives. Development of Devers West, which allows access to both Imperial Valley through Path 42 and Devers – Colorado River along the I10 access corridor, should begin now. Challenges around developing transmission to access critical geothermal resources in the Imperial Valley need to be overcome.

We appreciate the opportunity to provide these comments.