

CAISO 2012-2013 Transmission Planning Process

Clean Coalition comments

The Clean Coalition submits the following brief comments on the Transmission Planning Process Draft Study Plan following the Stakeholder Meeting Feb 28th, 2012:

The Clean Coalition supports the TPP draft study plan methodology as a thorough and well developed approach consistent with applicable orders and standards, and we have only one recommendation:

While the Base Case is clearly the primary reference case, it must be recognized that it does not represent a policy preference or probable future path for development, and restricting analysis to this single scenario inhibits due consideration of primary alternatives recognized in state policy, especially where the ISO's transmission plan is used as the reference case in other policy determinations and proceedings.

We recommend that all four CPUC defined scenarios be included for comparison, and in particular that the "high-distributed generation" scenario be given full consideration.

We make this recommendation because:

- there is a likelihood that actual development will deviate from the Base Case in relation to the Governor's goal for higher levels of DG
- potential significant transmission cost reductions may result from greater deployment of DG
- future planning and changes in the Base Case may be influenced by findings for the sensitivity cases

The current interconnection study queues already contain active commercial applications for levels of DG consistent with the High-DG scenario, and the Governor has clearly and consistently called for 12,000 MW of DG by 2020 and directed state agencies to incorporate this goal in planning. Further, the CPUC's High-DG scenario incorporates the same cost weighting as the cost-constrained scenario adopted as the Base Case, increasing the likelihood of additional DG development consistent with this scenario actually being deployed.

Sincerely,

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