# Western Independent Transmission Group (WITG)

June 14, 2012

To the CAISO
**Via Email**: regionaltransmission@caiso.com

Re: Approval of Transmission Elements Under $50 Million Straw Proposal

The Western Independent Transmission Group (WITG) is pleased to submit these comments in regard to the Approval of Transmission Elements Under $50 Million Straw Proposal. WITG generally supports the CAISO proposal to include policy-driven or economically-driven transmission elements under $50 million. However, we believe the proposal should be broadened to include both transmission "projects" and "elements" as delineated in the May 31 draft. Our provision would further the CAISO's stated aim "to ensure that smaller and required projects and elements can be advanced more quickly than the annual process set out in the tariff."

WITG also believes the CAISO should include in its proposal more details regarding the process for setting up an 'early' competitive solicitation process for these accelerated projects/elements. In the stakeholder teleconference call held on June 7, there were comments by CAISO staff regarding how the process might work, and a purported timeline for conducting such. Yet, the extent of the current proposal as written only states that there will be a "two month period … following management approval of the element, and the Project Sponsor selection process will follow an accelerated schedule described in the Business Practice Manual." We agree that the BPM is the proper place to develop the rules, but including some early thoughts about what the BPM will say would go a long way for WITG members to understand what the CAISO is intending to do under the tariff revisions identified.

Finally, the proposal remains silent on reliability projects. Under FERC's Order 1000, there are provisions for competitively based reliability projects, and to the extent there may be either small reliability projects under $50 million or elements below the same threshold.

Sincerely,


Gary B. Ackerman
Executive Director