PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



CALIFORNIA ENERGY COMMISSION 1516 NINTH STREET SACRAMENTO, CA 95814-5512



February 27, 2014

Steve Berberich California Independent System Operator President and Chief Executive Officer P.O. Box 639014 Folsom, CA 95763-9014 *Transmitted electronically*

Re: Base Case and Alternative Renewable Resource Portfolios for the CAISO 2014-2015 Transmission Planning Process

Dear Mr. Berberich:

With the submission of this letter, the California Energy Commission (CEC) and the California Public Utilities Commission (CPUC) formally transmit to the California Independent System Operator (CAISO) the renewable resource portfolios that our agencies jointly recommend should be studied in the 2014-2015 Transmission Planning Process (TPP). This joint submittal fulfills our ongoing commitment under the May 2010 Memorandum of Understanding which called for transmission planning coordination of our respective Agencies. This year's renewable resource portfolios demonstrate the continued progress made towards meeting California's Renewable Portfolio Standard (RPS) mandate as well as a dedication to the use of preferred resources to achieve the state's climate goals.

The CPUC and CEC utilized a portfolio review process that allowed for robust stakeholder participation. Initial versions of the portfolios were subject to review and comment through the CPUC's Long Term Procurement Plan proceeding. The CPUC and CEC hosted a workshop on December 18, 2013 to present the portfolios to stakeholders, who subsequently had an opportunity to file opening and reply comments regarding the portfolios. Many stakeholders participated in the workshop and filed written comments. The final recommended portfolios reflect the careful consideration of these comments.

Steve Berberich February 27, 2014 Page 2

In addition to the updates based on new data from the August 2013 Project Development and Status Reports filed by the Investor-Owned Utilities with the CPUC, the portfolios reflect updates to: (1) the renewable net short calculation; (2) the energy demand forecast per the CEC's December 2013 Integrated Energy Policy Report (IEPR) forecast; (3) the cost of solar photovoltaic (PV) projects; (4) the available capacity on existing transmission; and (5) the environmental scores.

The CPUC and CEC recommend that the CAISO study the following four portfolios in the 2014-2015 TPP: (1) the 33% 2024 Mid Additional Achievable Energy Efficiency (AAEE), (2) the 33% 2024 LowMid AAEE, (3) the High Distributed Generation (DG) 33% 2024 Mid AAEE + Demand Side Management (DSM) and (4) the 33% 2024 Mid AAEE (sensitivity). All four portfolios give added weight to the "commercial interest" metric in the RPS Calculator, which essentially gives preference to projects that have an approved power purchase agreement and, at least, a "data adequate" status as it pertains to all major siting applications that are necessary for construction. The 33% 2024 Mid AAEE portfolio assumes a Mid level of additional achievable energy efficiency per the CEC's 2013 IEPR. We recommend that the CAISO study the 33% 2024 Mid AAEE portfolio as the base case since it represents a reasonable approximation of the current trajectory of renewable development.

We also recommend that the CAISO study two alternative portfolios in its 2014-2015 TPP: the 33% 2024 LowMid AAEE portfolio, which assumes LowMid levels of additional achievable energy efficiency; and the High DG 33% 2024 Mid AAEE + DSM, which is based on the "High DG" version of the RPS calculator and assumes a Mid level of additional achievable energy efficiency, high incremental amounts of behind-the-meter solar PV (i.e. beyond amounts embedded in the CEC's IEPR demand forecast) and low incremental amounts of behind-the-meter Combined Heat and Power (CHP) resources.

Moreover, we encourage the CAISO to study the 33% 2024 Mid AAEE (sensitivity) portfolio which considers the need of a new 1500 MW transmission line from the Imperial CREZ instead of the new 2400 MW transmission line from the Riverside East CREZ that the trajectory portfolio identifies as being needed. Significant renewable potential exists in the Imperial CREZ. However, transmission capacity updates incorporated into the RPS calculator for this TPP cycle and the RPS calculator's lack of accurate project information to increase transmission capacity in the Imperial CREZ limit our ability to forecast alternative portfolios. Therefore, we recommend that the CAISO consider transmission options to access this renewable potential by studying the 33% 2024 Mid AAEE (sensitivity) portfolio.

Steve Berberich February 27, 2014 Page 3

We appreciate the cooperative nature of the discussions regarding the 2014-2015 TPP and look forward to working collaboratively with CAISO staff in order to continue improving this process as we work toward implementing changes for the 2015-2016 TPP. If you have any questions about the details of the scenarios, please contact Carlos Velasquez at 415-703-1124 or carlos.velasquez@cpuc.ca.gov or Roger Johnson at 916-654-5100 or roger.johnson@energy.ca.gov.

Sincerely,

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Michael R. Peevey President, CPUC

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Keith Casey, CAISO VP for Market and Infrastructure Development
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Robert Oglesby, Energy Commission Executive Director
Brian Turner, CPUC Deputy Executive Director
Edward Randolph, CPUC Energy Division Director
Roger Johnson, Energy Commission's Siting, Transmission, and Environmental
Protection Division Deputy Director

Steve Berberich February 27, 2014 Page 4

Breakout By Technology						
Scenario Name	33% 2024 Mid AAEE	33% 2024 LowMid AAEE	High DG 33% 2024 Mid AAEE + DSM	33% 2024 Mid AAEE (sensitivity)		
Net Short (GWh)	30,551	33,287	26,562	26,562		
	Portfolio Totals (MW)	Portfolio Totals (MW)	Portfolio Totals (MW)	Portfolio Totals (MW)		
Discounted Core	9,109	9,112	11,440	9,063		
Generic	3,311	4,414	0	2,223		
Total	12,420	13,526	11,440	11,286		
CREZ	MW	MW	MW	MW		
Biogas	20	23	20	20		
Biomass	103	103	103	103		
Geothermal	235	235	171	777		
Hydro	-	-	-	-		
Large Scale Solar PV	7,411	7,911	3,595	5,969		
Small Solar PV	2,074	2,099	5,745	2,057		
Solar Thermal	1,350	1,350	827	1,208		
Wind	1,227	1,806	979	1,153		
Total	12,420	13,526	11,440	11,286		
New Transmission Segments	Kramer - 1	Kramer - 1	Kramer - 1	Kramer - 1		
	Riverside East - 1	Riverside East - 1		Imperial - 1		

	Breakout By CREZ						
Scenario Name	33% 2024 Mid AAEE	33% 2024 LowMid AAEE	High DG 33% 2024 Mid AAEE + DSM	33% 2024 Mid AAEE (sensitivity)			
Net Short (GWh)	30,551	33,287	26,562	26,562			
	Portfolio Totals (MW)	Portfolio Totals (MW)	Portfolio Totals (MW)	Portfolio Totals (MW)			
Discounted Core	9,109	9,112	11,440	9,063			
Generic	3,311	4,414	0	2,223			
Total	12,420	13,526	11,440	11,286			
CREZ	MW	MW	MW	MW			
Alberta	300	300	300	300			
Arizona	400	400	400	400			
Baja	100	100	100	100			
Carrizo South	900	900	300	900			
Distributed Solar - PG&E	984	984	3,449	984			
Distributed Solar - SCE	565	565	1,988	565			
Distributed Solar - SDGE	143	143	157	143			
Imperial	1,000	1,000	1,000	2,500			
Kramer	642	642	62	642			
Mountain Pass	658	658	165	658			
Nevada C	516	516	266	516			
NonCREZ Riverside East	185	191	133	182			
San Bernardino -	3,800	3,800	1,400	1,400			
San Bernardino - Lucerne	87	87	42	42			
San Diego South	-	384	-				
Solano	-	200	-				
Tehachapi	1,653	2,148	1,285	1,483			
Westlands	484	505	389	469			
Central Valley North	-	-	-				
Merced	5	5	5	5			
Total	12,420	13,526	11,440	11,286			
New Transmission	Kramer - 1	Kramer - 1	Kramer - 1	Kramer - 1			
Segments	Riverside East - 1	Riverside East - 1		Imperial - 1			