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Comments on the Renewable Resource Integration Study Work Group Meeting of January 13, 2008

Plexos Study - The approach to the study does not seem to have the depth to determine the impact of the 20% RPS on the existing fleet and over-generation conditions. We would encourage the CAISO to begin a more detailed analysis since the initial results of the current study show shortages of regulation, spin, and non spin in the summer months, and over-gen in the spring. It has been projected that the CAISO will need additional regulation and possibly fast regulation as penetration of wind and solar resources increase. This needs to be substantiated and communicated to market participants.

We are concerned about the high focus on wind resources going forward without considering large scale PV solar. This approach may simplify the study based on an assumption that most solar resource development would be solar thermal technology and that PV would be limited to smaller penetrations on rooftops. The validity of the current study assumption must be substantiated. We believe that rapid movement of solar PV toward grid parity, possibly before 20% RPS is reached, will drive renewable technology penetration toward large scale PV. Increased penetration of large scale solar PV should be included as one of the study cases now so it is understood how the benefits of large scale, grid parity, PV solar resources can be realized as renewable penetration 20% and beyond.

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