



Below please find the Comments of NRDC to the Draft 2014-2015 CAISO Transmission Study Plan.

NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing. NRDC has a long history of efforts to protect and conserve the nation’s natural resources, including in particular the nation’s air, water, lands and resources. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America’s energy needs both at the national level and in various states, including California.

Page/ Section	Comment	Resources or Links
Page 2 2.1	We appreciate the opportunity for stakeholder input into the Plan at key stages.	
Page 3	In addition to SWAT, which other sub-regional groups (such as SIERRA and regional organizations as ColumbiaGrid and Northern Tier Transmission Group) has CAISO consulted with? It would be useful to have a listing of all of the entities.	
Page 3 Page 38	CAISO referenced using WECC data, but that step is not mentioned in this schedule. Can you please note when WECC data was used in the planning activity cycle? We agree using WECC data is critical to transmission planning and support the work CAISO does with TEPPC.	
Page 6	NRDC appreciates broadening the review scope to include approaches to consider resources outside the BA for RA purposes.	
Page 6	CAISO received feedback from FERC regarding Order 1000, but this is not included or noted in the guidance for public policy new elements. Also, there were non-transmission alternative requirements and	

	this should be noted.	
Page 6	CAISO should clarify the timeline for the study plan is a 10-year horizon.	Mention on page 10 for reliability study horizon, but should be for entire plan.
Page 6	Will CAISO add more scenarios such as studying a 40 or 50% RPS?	Draft legislation in works at CA legislature
Page 5	Appreciate the availability of data and accessibility.	
Page 7	Glad to see CAISO including RA import capability outside the ISO BAA, NRDC is interested to learn whether additional policy-driven transmission needs arise.	
Page 8	Glad to see CAISO working again with the CTPG, and look forward to public participation in discussions on their plans. CTPG is the only statewide process in which Investor and Publicly owned utilities can jointly plan. Please make information for meetings and calls available on websites.	Both CAISO and CTPG. CTPG still mentions many attributes on hold and now should reopen with this initiative.
Page 12	Again, WECC should be mentioned here 4.4	
Page 12	Minor edit: Fix 4.1.9 to 4.19	
Page 30	Can CTPG also help with Post Transient Analyses? This would provide an entire statewide perspective.	
Page 30	Mention outages, but what about planned outages...are these categorized differently? This should be clarified.	
Page 32	Glad to see inclusion of lower cost alternatives to construction of transmission additions or upgrades and inclusion of demand side management and energy efficiency.	
Page 34	In Section 5.2 is any behind the meter local capacity studied? We realize this is tough to do, but understand CAISO is developing new modeling capacities in this arena.	
Page 35-36	NRDC appreciates the inclusion of energy efficiency, demand response, renewable generating resources and energy storage as preferred resources.	
Page 36	Minor edit: Fix 4.1.9 to 4.19	
Page 36-37	Over generation: NRDC recommends that CAISO consider ways other than curtailment to address the issue of overgeneration, including the recommendations on the recent E3 report on utilizing a strategy of regional coordination and a diverse resource portfolio to address these situations. In addition work by Jim Lazar (Teaching the Duck to Fly, February, 2014, Regulatory	See: http://switchboard.nrdc.org/blogs/czichella/coordination_is_californias_le.html http://www.raponline.org/feature-work/teach-the-duck-to-fly-integrating-renewable-energy

	Assistance Project) emphasizes the importance of this multi-faceted approach involving a diverse portfolio of resources and geographies.	
Page 38	Which tariff (CPUC or FERC?) does section 24.4.6.6 relate to?	
Page 40	What is the Mid AAEE assumption? It is not spelled out here.	

Natural Resources Defense Council

Carl Zichella, Director of Western Transmission

Julia Souder Prochnik, Consultant

Nicholas Jimenez, Legal Fellow

111 Sutter Street, 20th Floor

San Francisco, CA 94104

czichella@nrdc.org