



WESTLANDS

SOLAR PARK

DATE: February 25, 2013
TO: CAISO
FROM: Westlands Solar Park
RE: Comments to the Draft 2012-2013 Transmission Plan

Westlands Solar Park submits the following comments to the draft 2012-2013 CAISO Transmission Plan. We appreciate the CAISO staff work in drafting the plan and providing opportunities for stakeholder to comment. This plan is an important document that sets the framework for how California will meet its renewable goals. Westlands believes that transmission to support the conversion of drainage impaired to solar energy production in the central valley needs to be in the final 2012-2013 CAISO Transmission Plan. Regulatory agencies responsible for planning how California will chart the course for utilities to meet their renewable goals should be incorporating transmission plans that are “smart from the start” meaning that they are multi purpose and multi use transmission lines, they support renewable development on disturbed land (i.e. drainage impaired agricultural land), and they are part of the original foundation lines identified in the RETI stakeholder process.

Summary Comments from the WSP:

- Westlands supports the following identified upgrades as an important first step towards a combined policy, economic, and reliability driven improvement to the central valley region:
 - ✓ The upgrade of the Gates 500/230kv Transformer #2 by 2017
 - ✓ The identified and recommended Gates-Greg 230kv transmission line
 - ✓ The greater Fresno area 115kv upgrades
- These combined upgrades as well as others identified in the transmission plan can better enable improved reliability in the greater Fresno area, increase the Helms pump storage utilization, and enable highly supported renewables in the central valley to meet our state’s 33% RPS mandate in a more balanced approach providing geographic diversity to other renewable sources heavily concentrated in southern California
- Westlands recommends the following changes to this current 2012-2013 draft transmission plan:
 - ✓ The identified Gates-Greg 230kv line was shown with an in service date of 2022; this should at minimum be amended to a date prior to 2020 with a target date of 2017

- ✓ Not allowing this upgrade to occur prior to 2020 could significantly limit the potential policy benefits that this project can bring to the state. Specifically this may disallow renewable generation in the greater Fresno area and within the Westlands CREZ from being able to interconnect in time to meet the policy goals of the state
- Westlands recommends the following considerations for future transmission planning cycles:
 - ✓ Consider larger solutions to address path 15 and path 26 congestion issues including potentially developing a new 500kv line in the region
 - ✓ Consider under long term planning scenarios the potential for RPS standards above and beyond 33%
 - ✓ Considering the significant in state resources California has to offer with geothermal, wind, solar PV and solar thermal, we suggest the ISO, PUC and CEC consider scenarios where the quantity of out of state renewables in resource planning assumptions are reduced. Current renewable portfolio standards require the prioritization of in state resources; Westlands alone has been identified by RETI stakeholders as having up to 5,000 MWs of solar PV generation potential