

The ISO received comments on the California Statewide Transmission Plan from the following:

1. TransWest Express LLC (TWE)
2. California Public Utilities Commissions (CPUC)

Copies of the comments submitted are located on the *2014-2015 Transmission planning process* page at:
<http://www.caiso.com/planning/Pages/TransmissionPlanning/2014-2015TransmissionPlanningProcess.aspx> under the *Phase 2* heading.

The following are the ISO's responses to the comments.

No	Comment Submitted	CAISO Response
1	TransWest Express LLC (TWE) Submitted by: David Smith	
1a	<p>TransWest Express LLC (TransWest) appreciates the opportunity to provide comments on the updated 2013-2014 Conceptual Statewide Transmission Plan. TransWest is an independent transmission developer that is focused on permitting and developing the TransWest Express Transmission Project (TWE Project). Western Area Power Administration (Western) is proposing to participate as a joint owner with TransWest in the TWE Project. Western will make its decision whether to continue its participation in the project into the construction phase when the environmental analysis is complete. Western as a transmission owner and operator in California and the region is a member of WestConnect and the California Transmission Planning Group. TransWest has been involved with regional planning initiatives at WECC, WestConnect, NTTG and the California Independent System Operator (CAISO) with a focus on analysis and planning process improvements on cost-effective inter-regional transmission projects. Our comments are as follows.</p>	<p>The CAISO understands that Western Desert Southwest and Western Rocky Mountain Region are the proposed participants in the TransWest Express line. These entities are not part of the California Transmission Planning Group (CTPG) and as such, would not be considered as part of the California Statewide Transmission Plan. Western Southern Nevada is a participant of CTPG.</p>
1b	<p>1. The TWE Project will connect to the CAISO grid, therefore TransWest believes that this interregional project should be considered for inclusion in the California Statewide Transmission Plan and should be analyzed within CAISO's 2014-2015 Transmission Planning Process.</p> <p>The TWE Project is 3,000 MW high-voltage, direct current (HVDC) transmission project that will provide California with access to the high-quality wind resources in south-central Wyoming. The TWE Project is being developed as an inter-regional transmission network infrastructure project that will interconnect with the AC transmission system in Wyoming and in Nevada. The Nevada interconnections will include the four existing 500 kV substations in the Eldorado Valley southwest of Boulder City. The TWE Project will interconnect with facilities operated by the CASIO, other CTPG members and other WestConnect member systems. The TWE Project is included in the WestConnect 2014 Transmission Plan.</p> <p>Further, the TWE Project will provide California with access to a renewable resource area that will provide consumers with substantial economic benefits</p>	<p>See answer provided above for CTPG.</p>

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	<p>due to high-quality and low-cost wind resources. Earlier this year, the National Renewable Energy Laboratory completed a study (NREL Study) for a 3,000 MW HVDC transmission line between Nevada and Wyoming and found such a line is likely to deliver significant economic benefits for California utilities and ratepayers. Building a 3,000 MW line makes economic sense for the region in the long run; however, we believe it may be prudent to initially build the terminals to accommodate 1,500 MW, which is equivalent to approximately 6,000 GWh/year of renewable resources, until sufficient demand is demonstrated for the full build-out.</p>	
1c	<p>2. TransWest respectfully requests that CAISO initiate analysis of a 1,500 MW HVDC transmission line extending from the Eldorado Valley of Nevada to south-central Wyoming, in accordance with the Open Access Transmission Tariff.</p> <p>TransWest encourages CAISO to work with other CTPG and West Connect members, including Western, to consider how such a transmission line could potentially serve multiple constituencies as an inter-regional transmission line potentially operated by the CAISO and other entities and owned by both private and public entities. We believe that the CAISO's Transmission Economic Assessment Methodology provides the appropriate framework to analyze such a project with a diverse group of transmission owners with their own tariffs and planning processes.</p>	<p>Per our tariff, the CAISO may only consider reliability, policy, and economic proposals that have been submitted to the CAISO following the processes provided by our tariff and Transmission Planning Business Practice Manual (BPM). The TransWest Express project has not met these requirements and cannot be considered by the CAISO regional planning process.</p>
1d	<p>3. TransWest respectfully requests that CAISO work with other CTPG entities, including Western, to evaluate the TWE Project as an inter-regional transmission project in the 2015- 2016 Transmission Planning Process.</p> <p>The 500 kV interconnections to the California transmission system in Nevada are designed to utilize the existing transmission capacity owned and operated by the CAISO, PTOs and other CTPG members. The NREL Study included Production Cost Modeling that found no material congestion on downstream transmission in California. Review of these downstream systems is a critical element to integrating the TWE Project into the California transmission network that needs to be performed by the CAISO and other transmission entities.</p>	<p>See answers provided above.</p>
1e	<p>We also note that significant progress has been made in obtaining the major federal permit for the TWE Project. The federal NEPA review for the TWE</p>	

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	<p>Project is being led by Western and the Bureau of Land Management, and this review is anticipated to be completed in 2015. Therefore, the TWE Project is planned to be placed in service in time to help California utilities meet their 2020 RPS obligations. The TWE Project also is proceeding with the WECC Path Rating Process, and transmission interconnection requests have been made to the utilities. The TWE Project could be built to serve the California RPS market prior to the 2020 timeframe in line with other projects identified in the 2013-2014 Conceptual Statewide Transmission Plan.</p> <p>TransWest believes the TWE Project is a sound addition to the Statewide Transmission Plan. It not only can help California achieve its 33% RPS goal but also can help position the state to reach even higher penetrations of renewables in the future.</p>	

No	Comment Submitted	ISO Response
2	California Public Utilities Commission (CPUC) Submitted by: Keith White	
2a	<ol style="list-style-type: none"> 1. On page 8, where is SMUD? 2. In Table 1, what is WASN? 3. On Table 2, the last part, are the Suncrest 300 Mvar SVC and the Lugo-Mohave series capacitors are CAISO recommendations in the 2013-14 TPP or early TPPs but were not approved by the CAISO BOD? If this is the case, including them in Table 2, do you mean you will recommend these projects again in this 2014-15 TPP cycle? 4. My understanding is that you are going to use this conceptual statewide plan as your input (assumptions) to the CAISO Phase II study of the 2014-15 TPP; am I correct? 	<p>SMUD is included as part of the Balancing Authority of Northern California</p> <p>WASN stands for Western Area Southern Nevada</p> <p>Yes; these projects will be considered in the 2014-2015 ISO regional transmission plan</p> <p>Yes; the primary purpose of the conceptual statewide plan is to inform the ISO's regional planning process; in this case the 2014-2015 regional plan.</p>