

October 10, 2012

California Independent System Operator
250 Outcropping Way
Folsom, CA 95630

RE: Stakeholder Initiatives Catalog

To Whom It May Concern:

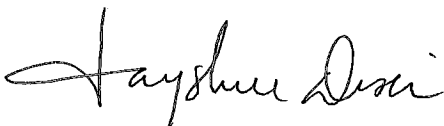
Centennial West Clean Line LLC (Clean Line) appreciates the opportunity to comment on the California Independent System Operator's (CAISO) Stakeholder Initiatives Catalog. Clean Line is developing the Centennial West Clean Line transmission project, a high voltage direct current (HVDC) line capable of moving 3,500 megawatts of renewable power from New Mexico and Arizona to California.

As a transmission developer, Clean Line is particularly focused on the proposed infrastructure and planning initiatives. Both the Generator Interconnection Procedures 3 (GIP 3) and Transmission Interconnection Process (TIP) initiatives are vitally important to meeting policy goals at the lowest cost possible. The GIP 3 and TIP initiatives should address a major obstacle for external transmission lines (those that connect to resources outside the CAISO footprint) to bring low-cost renewable power to the California market. Currently, the process by which deliverability rights on the CAISO system are allocated, the Generator Interconnection and Deliverability Allocation Procedures (GIDAP), is designed solely to accommodate generation projects rather than transmission projects. Without these rights, Centennial West and similar projects cannot be properly evaluated by load serving entities as an option to meet the California Renewable Portfolio Standard, resource adequacy requirements and other energy needs. The ISO previously recognized this issue when soliciting topics for consideration under the GIP 3 initiatives, but based on stakeholder prioritization earlier this year, it elected only to consider generator downsizing and delay other potential GIP 3 issues to 2013.

Without a means for external transmission lines to receive deliverability such projects cannot be properly evaluated in the ISO study process to determine necessary upgrades and ultimately receive an interconnection agreement. If a stakeholder initiative designed to address this issue is again postponed, the low cost, high-quality renewable energy options provided by external transmission lines will remain unavailable and projects offering significant benefits to California customers will be further delayed. Moreover, preventing external transmission lines from obtaining deliverability rights seems to be very much an inappropriate barrier to entry.

Clean Line respectfully requests that the ISO prioritize the issue of deliverability for external transmission lines through implementing the GIP 3 initiative, TIP initiative, or both no later than Q1 2013.

Respectfully submitted,



Jayshree Desai, Executive Vice President
Centennial West Clean Line LLC