



**Comments of Pacific Gas & Electric Company
2014-2015 Transmission Planning Process: Imperial County Transmission Consultation Second
Discussion Paper and October 8, 2014 Stakeholder Meeting**

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Independent System Operator's (CAISO) Imperial County Transmission Consultation Second Discussion Paper and the October 8th stakeholder meeting.

State Policy Regarding Deliverability Requirements of RPS Portfolios

PG&E does not believe that state policy is necessarily consistent with a requirement that all generation procured to meet RPS targets needs to be fully deliverable to or within the CAISO grid. Energy only and partially deliverable contracts are currently a viable option for renewable resources. PG&E appreciates the CAISO's clarification regarding the policy driven transmission analysis process, and encourages the CAISO to continue to work closely with the CPUC to clarify the intended state policies for the level of deliverability for resources within its portfolios. It is important to ensure that the cost of deliverability for resources driving policy driven upgrades is evaluated consistently among all the stakeholders and processes. PG&E looks forward to its continued collaboration with the CAISO and other stakeholders through the 2014-2015 TPP stakeholder process.

Maximum Import Capability (MIC)

PG&E agrees that reallocating MIC can be a cost-effective alternative to achieve the necessary transmission capacity and deliverability in certain areas. PG&E commends the CAISO for exploring alternative deliverability options and for including MIC issues in the Draft 2015 Stakeholder Initiatives Catalog.