



WESTLANDS

SOLAR PARK

March 13, 2014

TO: CAISO

FR: Westlands Solar Park

RE: Comments to the CAISO 2014-15 Transmission Planning Process Draft Study Plan

The Westlands Solar Park appreciates the CAISO's work in developing the draft study plan for the 2014-15 TPP. We believe that this study cycle will be a critical time to begin the preparation for planning for a post 33 percent renewable mandate and to move towards the goal of de carbonizing the grid in order to tackle global greenhouse gas emissions and the combat the ominous threat of global climate change.

While these comments are focused on the draft study plan for the 2014-15 TPP we believe it is necessary to point out that the CAISO cannot begin planning towards a post 33 percent renewable future if it continues to base the renewable planning assumptions on only commercial viability. The definition of planning is the "the act or process of making a plan to achieve or do something" and the CAISO cannot plan based on only signals from the companies that want to build renewable energy. The process of planning for a post 33 percent world needs to be conducted by the government and policymakers and specifically through the CAISO's annual transmission planning process, the CEC IEPR, and the CPUC's LTPP since these are the existing mechanisms the state has developed for integrating, procuring and planning for renewable energy in California.

We ask the CAISO, in this planning cycle, to engage with the Governor's Office, the CPUC, and the CEC on re-establishing a new stakeholder process to chart a plan for what California should be striving and planning for in a post 33 percent renewable paradigm.

The Westlands Solar Park team is ready to support and participate in this effort.