



Main Office: 193 Blue Ravine Rd, Suite
120, Folsom, California, 95630, **USA**
Office (916) 985- 9461, Cell (916) 337-
0558, Fax (916) 985- 9467,
www.ZGlobal.biz
Dubai (011) 971-50-6545364
France (011) 33-6-82158605

June 27, 2007

Chris Tooker, Manager
California Energy Commission
Systems Assessment and Facilities Siting
1516 9th Street
Sacramento CA 95814-5512

DOCKET	
07-OIR-1	
DATE	JUN 27 2007
RECD.	JUN 28 2007

Subject: Proposed Regulations for an Electric Transmission Corridor Designation
Process Under SB 1059

Docket No. 07-OIR-1

Dear Mr. Tooker:

Imperial Irrigation District ("IID") has reviewed the proposed regulations for
corridor designation posted June 8, 2007. Attached please find IID's
recommendation for your review.

We look forward to further discussions on the proposed regulations. I will be
present at the workshop on Friday, June 29 for additional discussion.

Please let me know if I can answer any questions.

Regards,

Ziad Alaywan
ZGlobal Inc. On Behalf of the Imperial Irrigation District



Main Office: 193 Blue Ravine Rd, Suite 120, Folsom, California, 95630, **USA**
Office (916) 985- 9461, Cell (916) 337-0558, Fax (916) 985- 9467,
www.ZGlobal.biz
Dubai (011) 971-50-6545364
France (011) 33-6-82158605

Imperial Irrigation District Recommendations to the California Energy Commission June 27, 2007

Recommendation 1) Staff- Proposed Regulations for an Electric Transmission Corridor Designation, Appendix G contains Staff recommended information requirements for a corridor designation application.” Part (d) of the Appendix identifies the “Conformity with Strategic Plan and Need for Corridor” information that the application shall contain. Specifically item (8) requires:

“a discussion of the latest CAISO transmission planning results that would support the addition of transmission project(S) that the applicant anticipates within the proposed corridor zone in the planning timeframe”

Imperial Irrigation District (“IID”) requests that this paragraph be expanded to also reference WECC/NERC planning and review processes. These processes are described in more detail below. As the Commission is well aware not all transmission owning entities in California are members of the CAISO. To limit an applicant’s discussion of the transmission project need to only the latest CAISO transmission plan could potentially overlook efforts underway by other entities in the state as well as regionally planned projects that the CAISO is not involved in.

WECC/NERC planning and review processes¹ are described below:

Planning Process Outline

The policies, guidelines, planning process, scenario examples, and study methodology are intended to provide guidance to WECC members on the process of planning and placing in service a project as well as to outline member responsibilities with regard to this process.

¹ WECC - Overview of Policies and Procedures for Regional Planning Project Review, Project Rating Review, and Progress Reports, Revised April 2005

1. A procedure for reviewing project conformity with WECC's role for coordinating regional planning;
2. Guidelines to demonstrate that regional, sub-regional, and non-CAISO Energy Resource host balancing area needs and efficiencies are considered;
3. A consistent and predictable process for planning (who does what, when, etc.) that is well understood and is accepted as standard practice in WECC;
4. Consistent methods for determining and demonstrating project ratings in accordance with NERC/WECC Planning Standards;
5. An Accepted Rating that has been reviewed by the WECC membership;
6. Allows for negotiations to resolve capacity allocation issues between parties; and;
7. A consistent and effective means for resolving disputes over capacity allocation issues should negotiations fail.

The WECC Regional Planning Project Review

The Regional Planning Review Process encompasses the initial development phase of a project in which regional interest is expressed. The Process addresses how transmission project sponsors should work and interact with other parties when developing a project that has or may have a significant regional benefit or impact. Through this process, WECC members cooperate to identify transmission expansion projects that may be beneficial to the region. By following this process, project sponsors may also address certain issues related to regulatory approval of their projects. The Regional Planning Review Process should begin as soon as possible and involve all interested project participants. Although it will vary, this phase of the process should start when interested project participants are devising their individual and collective transmission needs. This phase is completed when PCC has made a final determination regarding the project's conformity with the WECC Regional Planning Guidelines.