Pacific Gas and Electric Company

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DOCKET
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ELECTRONIC DELIVERY

California Energy Commission
Docket Office, MS-4
Re: Docket No. 09-IEP-1D
1516 Ninth Street
Sacramento, CA 95814-5512

Re: 2009 IEPR – Transmission

PG&E is pleased to provide comments to on the 2009 IEPR - Transmission Workshop. Please feel free to call me at the number above if you have any questions.

Sincerely,

Daniel H. Kim

Attachment

12/18/2008

Comments of Pacific Gas and Electric Company
Regarding the December 4, 2008 CEC Workshop on
2009 IEPR - Transmission
Docket 9-IEP-1D

PG&E appreciates the opportunity to participate in the December 4, 2008 workshop on the proposed forms and instructions for submitting electric transmission related data in support of the 2009 Integrated Energy Policy Report (IEPR). PG&E looks forward to working with the Commission to get the necessary data for this proceeding, which includes the filing of our transmission expansion plan. Regarding the draft report on forms and instruction, PG&E has the following comments:

- On page 7, PG&E will refer to the available Western Electricity Coordinating Council (WECC) reports in identifying merchant transmission projects that PG&E may be required to file on behalf of.

- On page 7, PG&E recommends that Seabreeze Pacific RTS (Seabreeze) is the proper entity to submit data on the West Coast Cable project, since Seabreeze has offered to do it, and Seabreeze most likely has more updated information on the project than PG&E. PG&E will be glad to submit data on PG&E owned facilities that interconnect to the West Coast Cable.

- On page 10, the proposed forms and instruction report requires transmission owners to provide descriptions and alternatives to "bulk transmission facilities needed for meeting state mandated electricity policy goals such as, renewable energy requirements, replacing aging power plants, complying with proposed State Water Resources Control Board (SWCRB) policies for phasing out power plants that use once-through cooling or eliminating or reducing local capacity requirements." PG&E supports the filing of such detailed information when there is a commitment by the transmission owner to file a certificate of public convenience (CPCN) at the CPUC for a project and the project scope is defined.

- PG&E supports the application of the Garamendi Principles in corridor planning identified on page 10-11 (items 5, 6 and 7) of the draft report. PG&E supports a long term planning horizon for corridor planning on conceptual projects with uncertain operation dates beyond 10 years. PG&E agrees with staff comments that most of the corridor planning information for conceptual projects would likely come from the renewable transmission initiative (RETI) process.

- Furthermore, PG&E believes that for transmission corridor planning to be effective there needs to be a process for the utilities to acquire the property, be able to rate-base and earn a return on the investment and have protection in the future licensing process. For these reasons, any corridor planning process will need the involvement from local government entities in order to acquire the needed property.