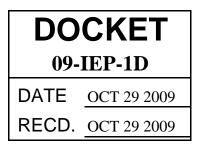
Comments of the Bay Area Municipal Transmission Group (BAMx)\* On the California Energy Commission Draft Strategic Transmission Investment Plan

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The Bay Area Municipal Transmission Group offers the following comments on the Draft 2009 Strategic Transmission Plan (STIP).

We recognize and appreciate that the CEC has based much of the 2009 STIP on the work accomplished in the Renewable Energy Transmission Initiative (RETI). We regard the RETI work to date as significant progress toward better State transmission planning and "no-regrets" actions. The STIP is well served by consistency and continuity with RETI.

As a group of load-serving entities in the Bay Area, we place very high importance on our future ability to import renewable energy for our customers via the Tracy/Tesla to Bay Area corridor. We note with high interest that the CEC has included certain segments of such transmission in the priority list of transmission in the 2009 STIP. We invite and encourage CEC staff to meet with BAMx members to explore plans of service that would fulfill the intent for the Bay Area that is in the 2009 STIP.

We also note that the CEC plans a heavy reliance on the California Transmission Planning Group (CTPG) to turn RETI and CEC plans into action. We find this reliance to be necessary, and we feel that the CTPG could become critical to the implementation of the State's transmission plans. But we would expect that to fulfill this role the CTPG should develop principles, processes and rules that inform and involve the same stakeholders that participate in RETI and the STIP. Our observation is that such principles, processes and rules do not yet exist.

The RETI, CEC, CTPG, the California Independent System Operator, the California Public Utilities Commission and other stakeholders should work to make CTPG an open, transparent and meaningful forum for State transmission planning and implementation.