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May 24, 2011

California Energy Commission
Docket office, MS-4
Re: Docket No. 11-IEP-1E, 11-IEP-1G
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In the matter of, Preparation of the *2011 Integrated Energy Policy Report*
(*2011 IEPR*) Docket No. 11-IEP-1E, 11-IEP-1G

COMMITTEE WORKSHOP

RE: Transmission Planning Needed to Meet State Renewable Policy Goals

Dear Chairman Weisenmiller and Commissioner Douglas,

The California Consumer Alliance (CCA) appreciates the opportunity to participate in the Integrated Energy Policy Report (IEPR) Committee workshop to address transmission plans, barriers, and recommended actions for interconnecting renewables to meet state policy mandates and provide these comments.

Introduction

The CCA is formed recently to represent California consumers' interests in the transmission and energy markets. In the past the CCA members have represented California consumer groups such as Save the Foothills Coalition (STFC), and UCAN in the various CAISO transmissions planning processes. Members of the CCA have been engaged in California transmission planning activities for many years and have noticed that the consumer voice is missing in the various California transmission planning discussions that the May 16 workshop focused on. The CCA hopes to the extent its limited resources allow to change that and make sure that the consumers, as those who ultimately bear all the costs of the transmission upgrades, and their interests are represented in transmission planning and approval processes in a significant and meaningful manner.

The CCA is an independent group whose views unlike many of other stakeholders are not based on financial interest in any particular project but supports the objective evaluation of the problems and feasible alternatives based on reasonable forecasts and input assumptions, engineering analysis, and cost benefit analysis of the proposed project and its alternatives as opposed to rhetoric. To contribute to this effort CCA brings and relies on its members with more than thirty years of experience in the utility and transmission planning areas.

Summary of Concerns

The CCA acknowledges and applauds the purpose of the Commission's workshop to support the 2011 IEPR's focus on the most effective approaches for meeting California's 33 percent Renewables Portfolio Standard by 2020 and for integrating 8,000 megawatts of large-scale renewable resources into California's electric transmission system, as envisioned in Governor Brown's Clean Energy Jobs Plan.

CCA believes that the transmission upgrades that are needed and are determined to be the best solution, considering all other feasible alternatives, should be approved and built particularly if they help the development and or access to renewable energy resources. However, we are concerned regarding some of the discussions during the workshop particularly in the after noon session by some panelists and found them not based on any facts. For example, based on extensive analysis, the CAISO has determined that no major transmission additions are needed, beyond what it has already approved, to reach the 33% RPS level. This finding is consistent with that of CCA expert's analysis of the data. However, we were puzzled by the comments made by some panelists regarding the need for additional specific transmission lines without offering any facts or data to support their recommendations. We have observed this kind of comments in the past and hope that our participation, facilitated by the Commission, can provide the balancing point of views necessary for a proper debate amongst the stakeholders. We have observed that lack of consumer participation has allowed in many cases a one sided debate to lead into

suboptimal solutions that may have benefited only certain participants at the expense of others.

The CCA appreciates the Commission's IEPR process to identify and facilitate greater coordination of the various agency tasks and engagement of stakeholders--not the least of these being California's consumers. Going forward, the CCA welcomes a greater discussion and analyses, in concert with all other stakeholder and look forward to an opportunity to help the commission in forming an advisory group with balanced representation from all stakeholders.

Respectfully Submitted,

California Consumers Alliance