

May 24, 2011

California Energy Commission
Dockets Office, MS-4
RE: Docket No. 11-IEP-1E, 11-IEP-1G
1516 9th Street
Sacramento, CA 95814-5512

RE: Comments of the Independent Energy Producers Association on the Committee Workshop on Transmission Needed to Meet State Renewable Policy Mandates and Goals in Preparation of the 2011 Integrated Energy Policy Report (2011 IEPR)

Docket No. 11-IEP-1E, 11-IEP-1G

Dear IEPR Committee:

The Independent Energy Producers Association (IEP) appreciates the opportunity to comment on the Committee's Workshop on Transmission Needed to Meet State Renewable Policy Mandates and Goals in Preparation of the 2011 Integrated Energy Policy Report (2011 IEPR), convened on May 17, 2011. IEP is California's oldest and leading trade association, representing over 26,000 MWs of non-utility, independently-owned generation resources in California.

In determining the long term energy future of the state, California Load Serving Entities (LSEs), generation and transmission developers, and other stakeholders are attempting to monitor and provide useful content to multiple, transmission planning processes, including those at the CEC, CPUC, California ISO, CTPG, as well as broader planning initiatives including the WECC's Transmission Expansion Planning Policy Committee (TEPPC). While IEP is aware that combining multiple planning efforts under one banner may indeed lead to more uncertainty and transmission development delays, it is clear that California could benefit from the direction and support of one agency, like the CEC, to enhance each ongoing planning effort while "smoothing the seams" between them all.

The following comments are provided for the Committee's consideration with the hope that they may improve each individual planning process and ultimately lead to transmission growth that serves all of California's renewable needs in a manner that is consistent with the federal requirement that transmission system access by market participants be open, transparent and nondiscriminatory in all respects.

I. Planning Initiative Schedule Coordination

CTPG recently requested a revised net short calculation for their 2011/2012 statewide transmission planning process. CTPG utilized the net short calculation developed by the CEC in the most recent IEPR. The recent CTPG request for a revised net short comes "in between" official IEPR cycles precipitating the need for CEC to address CTPG's request out of sequence with normal IEPR publishing schedules. Although the CTPG and the CEC appear to have reached a mutually agreeable solution with respect to providing CTPG with the calculation it requires at this time, this situation serves as a recent example of misaligned planning schedules.

IEP suggests that the CEC manage a collaborative process between all state and industry transmission planning organizations with the intent of producing alignment between each agency/entity's planning cycle. The beneficial outcome from implementation of this recommendation includes timely creation, dissemination, and collaboration of critical planning data, including but not limited to, net short calculations. IEP believes that a coordinated schedule of transmission planning initiatives will also indicate to a wide range of stakeholders that decisions with respect to transmission projects will move expeditiously from plan to reality, meeting California's 33% target on time.

II. Timely and Consistent Planning and Information Access

IEP requests consideration by the Committee of a concept to be applied across all planning entities within California that provides for transparent, linked, real-time access to all planning information used by a planning entity (with exceptions as necessary for commercial confidentiality, CAISO/WECC data management protocols, etc). IEP like other commenters at the May 17th workshop is interested in both the policy-oriented discussions within each transmission planning initiative as well as detailed planning-related data and information that supports the policy positions. IEP agrees that tracking and accessing the myriad of planning

information can be a time-consuming and frequently frustrating exercise. The planning initiatives described above utilize data and information they receive from external sources in addition to volumes of data and information created internal to their own processes. Time is of the essence when creating a more functional and integrated transmission planning framework while selecting and building renewable transmission that gets us to our 33% goal. Once stakeholders can easily access current planning information and data they will be better equipped to participate in and advocate for a successful transmission planning process.

III. Statewide Unified Planning Assumptions

IEP asks the Committee to consider a policy that will ensure that all state agencies, authorities, and entities involved in transmission planning collaborate and maintain a consistent and unified set of planning assumptions. Moreover, IEP suggests that entities requesting approval or certification of their planning processes and subsequent results, document that their process utilized the then-current set of statewide unified planning assumptions. With many different entities being entrusted with their respective “slice” of the transmission planning pie in California, the need for a consistent set of unified planning assumptions is immeasurable. There is no faster route to undermining the integrity and confidence in a planning outcome than the determination that underlying assumptions differ, or are used differently, than within other significant transmission planning processes.

IV. Assumptions Workbook

In concert with item number III above, IEP recommends that the Committee consider CEC’s role with respect to an Assumptions Workbook, which all state transmission planning initiatives would contribute to and draw from for purposes of their respective processes. As importantly, IEP believes that the Assumptions Workbook must be accessible to all stakeholders. IEP also believes that this level of transparency can facilitate more fruitful stakeholder interactions and result in transmission planning outcomes that garner greater public confidence.

Conclusion

The CEC is positioned to play a unique role with respect to ensuring transmission planning in California supports the competitive marketplace in an open, transparent and nondiscriminatory manner. The stakes are high and California deserves transmission

development that supports/facilitates competitive renewable (and other) generation development. IEP appreciates the opportunity to make these comments and suggestions with respect to the appropriate influence we believe the CEC can and should exercise regarding California's transmission planning future.

Respectfully submitted,



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