

CalWEA Comments on the CTPG Phase 3 Draft Study Results

California Wind Energy Association (CalWEA)

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CalWEA appreciates the opportunity to comment on the CTPG Phase 3 report. For this report, our comments will all be on broad level only and will deal with general study approach and the CTPG stakeholder process. But before we submit our comments, we would like to bring up a couple of procedural concerns.

First, we have noted that the CalWEA comments on the CTPG Phase 2 study report, which was submitted within the prescribed timeline for comments on Phase 2 report, is not yet posted. We are attaching those comments here.

Second, we believe that in order for us to effectively provide our comments on the CTPG Phase 3 report, there is a need for a CTPG stakeholder meeting where Phase 3 results would be formally presented and an opportunity is provided for Q&A on such results. Unfortunately, CTPG has indefinitely postponed the Phase 3 report stakeholder meeting.

As far as our comments on the Phase 3 results are concerned, we would like to note that practically all our comments on the planning process and study methodology of the CTPG Phase 2 report is also applicable to the Phase 3 study report. We still believe that the broad planning approach and study methodology used by the CTPG are incorrect and fail to address the special needs of this study. We have proposed a proper approach in our Phase 2 comments for correctly performing the needed planning studies and would still request that our proposed approach be considered/adopted by the CTPG. Furthermore, we would like to note that, due to the improper approach used by the CTPG for performing its planning study, the study of the proposed transmission projects by the independent transmission companies could not be properly conducted during the Phase 3 studies either.

Finally, we must note that we are dismayed with the way CTPG has been conducting its stakeholder process recently and especially disappointed that the CTPG stakeholder meeting on Phase 3 report has been indefinitely postponed. It is important that CTPG re-establish its interactions with its stakeholders as soon as possible.