

Comments by Ron Dickerson, on October 13, 2009

In the Matter of: *Preparation of the 2009 Integrated Energy Policy Report (2009 IEPR)*
Docket No. 09-IEP-1D NOTICE OF JOINT COMMITTEES HEARING

Notice of Hearing on the Joint Committees' Draft 2009 Strategic Transmission Investment Plan

To Whom It May Concern

As a non-commercial interest stakeholder in issues addressed by the Strategic Transmission Investment Plan, I appreciate that the CEC is actively soliciting input from persons and groups outside of the energy industry, who are affected by transmission planning. While barriers still exist for the full public participation in CEC hosted stakeholder processes, I recognize some recent improvements in accessibility. I would encourage a continuing public outreach by the CEC, to build confidence of fair representation in CEC processes and policies.

As noted, in the well prepared and presented 2009 IEPR Draft Committee Report, California needs a much more coordinated Transmission Planning process. Many of the shortcomings of current planning are outlined, as well as potential solutions in the IEPR draft and supporting STIP document. However there also seems to be a "disjointed" implementation of policies that are established and adopted in the 2003 Action Plan, expressly The Loading Order.

As California agencies including the CEC have become proactive in the development of transmission to connect to renewable resources, it becomes increasingly difficult to see how the Loading Order criteria are and will remain to be a function in the determination of need for infrastructure development. Current transmission planning, at the California Independent System Operator, all but ignores the Loading Order solutions in analyzing upgrades to the statewide transmission system. As the CAISO is currently the agency that identifies and evaluates transmission upgrades in much of the state, and may have an expanding sphere of influence outside of the IOUs service area, CEC and CPUC involvement could be seen as crucial. CPUC Energy Division staff has reminded CAISO regional transmission planners of developing Loading Order criteria based solutions for analysis and vetting in the determination of need for transmission. Staff at the CEC will hopefully follow suit, so that the benefits of these solutions will have greater opportunity to be captured, in a manner consistent with the 2003 Action Plan.

I respectfully ask that the 2009 Strategic Transmission Investment Plan would describe the implementation of these established policies. The STIP should describe how CEC involvement in any future coordinated statewide transmission planning would assist and direct stakeholders to identify potential first and second order solutions rather than just transmission. Otherwise the Loading Order criteria policies are increasingly meaningless. This certainly would seem consistent with a "No Regrets" approach as so much uncertainty remains in the development renewable energy in remote parts of the state.

Respectfully Submitted, Ron Dickerson