

July 10, 2009

Ms. Clare Laufenberg Gallardo  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Subject: Renewable Energy Transmission Initiative – Phase 2A Draft Report  
Comments by Cogentrix Solar Services LLC

Dear Ms. Gallardo:

We have reviewed the RETI Phase 2A Draft Report and appreciate the extensive amount of effort expended by all parties involved in its preparation. We share the objectives of addressing the transmission line requirements necessary to meet the State's renewable energy goals and have prepared the following comments on the report for your review.

Since 2007, Cogentrix has pursued the development of two solar projects within the San Bernardino-Baker CREZ. The two solar projects are the Baker Solar Project and the Silurian Valley Solar Project. The Baker Solar Project will consist of seven solar fields (subject to final design) with a nominal total net output of 350 MW. The Silurian Valley Solar Project will consist of four solar fields (subject to final design) with a nominal total net output of 200 MW. The Projects are located in the San Bernardino-Baker CREZ adjacent to the Mountain Pass Renewable Collector Line as identified in the Renewable Energy Transmission Initiative (RETI) Phase 2A Draft Report. The following comments reflect our ongoing efforts to develop the Baker and Silurian Valley Solar Projects and our related interest in implanting the Mountain Pass collector line segment additions.

#### Proposed Mojave Desert National Monument

Section 1.2.5, page 1-6 and Section 2.5, page 2-31. The text in these sections describes the proposed Mojave Desert National Monument and identifies the CREZs that are potentially affected. In both sections, the Baker CREZ is mistakenly identified as being potentially affected by the proposed National Monument. The San Bernardino-Baker CREZ, as well as the Mountain Pass collector line, are located north of I-15 and the Mojave National Preserve and would be unaffected by the proposed designation of the Mojave Desert National Monument.

Correctly, the Phase 2A report acknowledges the potential implications regarding the designation of the proposed National Monument on several CREZs, specifically, the Pisgah, Iron Mountain and Needles CREZ. The uncertainties regarding the potential renewable energy from these CREZs should also be reflected in the priority status of the collector lines that serve these CREZs.

## Line Segment Analysis

We also feel that the analysis of the line segments that comprise the Mountain Pass group should be revised as follows:

- Appendix D includes a segment identified as MTPS\_BARS\_1 with a segment length of 109 miles; that segment is not identified anywhere else in the Phase 2A report and it appears that it should be removed. The environmental issues along this segment are otherwise reflected by the segments MTPS1\_BAKR1\_1 and BAKR\_BARS1\_1.
- The three segments that comprise the majority of the Mountain Pass collector line – MTPS1\_ELDO\_1; MTPS1\_BAKR1\_1; and BAKR1\_BARS1\_1 are shown in Appendix D as having high environmental concern. However, these segments are identified as new lines in Appendix D but are described in Appendix I as replacement of an existing 115 kV line. Appendix D should be revised to identify these segments as “rebuild/footprint changes” and the level of environmental concern should be lower to reflect the fact that these segments would consist of rebuild along an existing right-of-way and/or immediately adjacent thereto. In addition, while the right-of-way width would likely increase to accommodate the proposed 500 kV single-circuit line, the project footprint would be reduced because the longer spans of the 500 kV line would result in fewer transmission line structures.
- The length of the segments identified above should be verified; the segment lengths provided in Appendix D are consistent with Appendix I (List of Component Facilities) but inconsistent with Appendix G (Description of Line Segments) and Appendix H (Line Segment Data).
- The line segment data shown in Appendix H for segment MTPS1\_BAKR1\_1 is identical to the data shown for segment BAKR1\_BARS1\_1 and appears to be in error since the segment lengths (and corresponding costs) should be different.
- Appendix H indicates that the MTPS1\_ELDO\_1 segment has an on-line date of 2012 while the remaining segments of the Mountain Pass line group have on-line dates of 2015. Appendix G indicates that this line segment is “planned to access CREZs in the Mountain Pass area and transfer the power to California via Eldorado 500 kV substation.” This statement seems to imply that the direction of the flow of electricity can be controlled on this single segment, which is inconsistent with the concept of this “network” connection. We question whether this single segment can be placed on-line before the other segments of the Mountain Pass line group, recognizing that system impact studies would need to be conducted by CAISO to determine the feasibility of this conceptual transmission plan. We also question how interconnection of the Mountain Pass

CREZ to the Eldorado 500 kV substation in Nevada would result in the transfer of this power to California. In the absence of further information to support the priority of this single segment, we suggest that the other segments of the Mountain Pass line group described within the RETI report that if built could accommodate the delivery of the energy from the renewable projects included within the Baker CREZ be given the same priority and shown with on-line dates of 2012.

- Appendix G indicates that line segments PISG\_MIRA\_1; PISG\_LUCV\_1 and LUCV\_LUGO\_1 are planned to provide for the transfer of power from the Mountain Pass CREZ (among others). This is inconsistent with the description of the Pisgah line group provided in Section 3.5 (page 3-52) of the Phase 2A report. Considering the geographic separation and lack of any direct or proposed transmission link between the Mountain Pass CREZ and the Pisgah substation, the Mountain Pass CREZ should remain tied to the Mountain Pass line group rather than the Pisgah line group.

### Conclusions

The Mountain Pass line group is the only renewable collector line in Southern California that provides a direct interconnection to out-of-state renewable energy resources. In addition, the Mountain Pass line group is located within a designated energy corridor, and the majority of the proposed line would be a replacement for an existing transmission line, which should be reflected in a high environmental preference and relatively low environmental concerns due to the existing transmission line corridor and rights of way. In addition, the Mountain Pass line group would provide immediate transmission access for 750 MW of solar power under active development (see Appendix C – CREZ Refinement Matrix). As stated above, the Mountain Pass line group and the CREZs that would be served by that line are unaffected by the uncertainties associated with the proposed Mojave Desert National Monument. Considering all of these points, the Mountain Pass line group should be accorded a higher priority and recommended for immediate study by CAISO.

Thank you for this opportunity to provide comments on the Phase 2A report. We look forward to remaining engaged throughout the RETI process and working to help meet the challenging renewable energy goals established by the State of California.

Regards,

Gary L. Palo  
Vice President Development