



Valley Electric Association, Inc.

A Touchstone Energy® Cooperative 

Valley Electric Association Comments Regarding 2013-2014 TPP Renewable Portfolios January 11, 2013

Valley Electric Association, Inc. (VEA) is pleased to submit these comments to the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) regarding the renewable resource portfolios proposed by the CPUC and the CEC for use in the California Independent System Operator Corporation's (CAISO) 2013-2014 Transmission Planning Process (TPP).

VEA is a member-owned electric cooperative, which is headquartered in Pahrump, Nevada, and VEA serves customers in an approximately 6800 square mile service territory located along the border between Nevada and California. While the majority of VEA's customers are located in Nevada, it also serves customers in California. On January 3, 2013, VEA joined the CAISO Balancing Authority Area as a Participating Transmission Owner, Utility Distribution Company, and Load Serving Entity. On January 3, 2013, VEA also energized a new 230 kV transmission line between Pahrump, NV and the North side of Las Vegas, NV. The new line completes a 172-mile 230 kV transmission loop through southern Nevada that runs from Western Area Power Administration's Mead Substation to NV Energy's Northwest Substation. Finally, VEA has submitted an interconnection request to Southern California Edison for a new point of interconnection between VEA's system and the CAISO Controlled Grid at or near the Eldorado Substation.

VEA is offering these comments to ensure that the TPP appropriately considers transmission upgrades necessary to integrate and deliver proposed renewable generation on the VEA system to CAISO load serving entities. VEA thanks the agencies for their consideration, and would be pleased to entertain further discussion about our comments.

VEA would like to understand the assumptions in the TPP with respect to renewable resource development in the Eldorado area. In the 2012-2013 CAISO TPP, the commercial portfolio identifies 750 MWs of renewable generation in the Eldorado area, which includes 500MWs of solar thermal and 250 MWs of large-scale solar. However, the proposed 2013-2014 portfolios assume only 407 MWs of renewable resources at Eldorado in the Commercial, Environmental, and High DG portfolios. We are not aware of any change in proposed resource development that would justify such a change; therefore, VEA requests clarification of why the assumed renewable generation at Eldorado was reduced compared to the 2012-2013 portfolios.

In addition, VEA requests further clarification as to the assumptions used with respect to out-of-state renewable resources, including the extent to which the portfolio selection of such resources factors in the possible need for additional transmission within California that may be required to deliver the energy from such resources to load centers in California.