



June 24, 2011

James Avery, Chairman  
California Transmission Planning Group  
San Diego Gas and Electric

**RE: 2011 Study Request to the California Transmission Planning Group Southwest Import Scenario Request – West of River Support Letter**

Dear Mr. Avery:

The Large-scale Solar Association (LSA) appreciates the opportunity provide stakeholder comments on the efforts of CTPG and the proposed 2011 study scenarios. In addition to the West of River (WOR) scenario CTPG is currently developing, LSA would like to express support of a second WOR study scenario that examines heavy injections from the Palo Verde hub.

Specifically, LSA supports including the following scenarios in the CTPG's 2011 Study:

1. Study Scenario # 1 (WOR - Heavy El Dorado Injection) – 2011 WOR study scenario with the 2010 assumptions (using a 40% Southwest import assumption) with the following injection allocations: 50% at El Dorado, 37% at Palo Verde and 13% at North Gila under heavy autumn conditions;
2. Study Scenario # 2 (WOR – Heavy Palo Verde Injection) – 2011 WOR sensitivity study scenario (using a 40% Southwest import assumption) with the following injection allocations: 50% at Palo Verde, 37% at El Dorado and 13% at North Gila under heavy autumn conditions.

In addition, we support both scenarios incorporating the Once-Through-Cooling (OTC) criteria proposed by CTPG.

Thank you again for consideration of this request.

Sincerely,

Kristin Burford  
Policy Director, Large-scale Solar Association