



Comments of Michigan Electric Transmission Company, LLC (“METC”) and International Transmission Company *d/b/a* ITCTransmission (collectively “ITC”)

ITC provides the following items for consideration in the Ready Michigan to Make Good Energy Decisions: Renewable Energy report. Our company believes the following comments provide clarity on some issues.

A. Pages 3 and 24 Need for Additional Infrastructure Improvements in Relationship to Technical Feasibility of an Increased Renewable Portfolio Standard (“RPS”)

The need for additional infrastructure improvements varies greatly depending upon the amount of renewable resources, the location of such resources, and the extent to which out-of-state resource options are utilized. In instances where new resources are located in areas where the transmission grid has been developed and is more robust, it is likely that the amount of infrastructure improvements needed would be substantively less. The converse is true for areas that currently have minimal to no transmission system development. As an example, the Thumb Loop 140-mile double-circuit 345,000 volt line represents an area of the state with adequate backbone¹ infrastructure to incorporate new renewable resources².

B. Page 23 “Possible Future Demand Under Several Scenarios”

ITC disagrees with the overly simplistic statement that the *“failure to have enough energy available to satisfy peak demand will result in widespread instability.”* Although it is possible for widespread instability to occur for certain catastrophic scenarios, it is unlikely. It is important to differentiate between having a shortfall of a few megawatts in a local area versus much larger shortfalls of generation capacity throughout a broader region. Smaller short falls can typically be alleviated through power redirections through generation redispatch and/or flow controls, while larger shortfalls could be managed with intermittent load shedding. The main point to recognize is there are several options for system response depending upon the amount of shortage. The transmission system is planned and designed to meet peak demand under a variety of contingencies including to avoid issues that otherwise could arise in real-time operations such as shortfalls of generation in localized areas.

¹ Additional “interconnection facilities” will be necessary to connect new generation to the Thumb Loop. The scale of these interconnection facilities will depend on the proximity of the new generation to the Thumb Loop.

² The Thumb Loop was designed to accommodate both the minimum and maximum wind potential in the region. It is capable of supporting up to 5000 megawatts.