

Pursuant to Commissioner Peevey's Ruling Regarding Next Steps in Procurement Proceeding, dated December 2, 200, National Grid USA ("National Grid") respectfully submits these Comments pertaining to the Workshop on Transmission Planning Collaboration held on December 14, 2005.

Transmission is the vital link that will enable many of California's energy policy goals, including renewable portfolio standards, to be achieved. The existing transmission system is in many areas constrained and significant new investment will be necessary if these goals are to be achieved. For this new investment to be efficient, it needs to be planned across the widest possible area. National Grid therefore supports the efforts of the CPUC, CEC and CAISO in coordinating transmission planning at a state level and would encourage, in the longer term, initiatives to extend this to region-wide planning.

Much of the new transmission investment will be made by the California based Investor Owned Utilities but the independent transmission sector is also a vital source of resources and capital. It is significant that it was an independent transmission company (TransElect) that was able to achieve construction of Path 15 and that another (Babcock and Brown) is making the TransBay Cable project a reality. This is therefore a sector that CPUC, CEC and CAISO should actively encourage. This would be consistent with FERC's own policy objectives stated within the NOPR – "Promoting Transmission Investment Through Pricing Reform" 11/18/05, Docket No. RM06-4-000.

National Grid therefore proposes that:

1. For projects identified through the planning process and assigned to an entity, a reasonably high standard is set with respect to determining whether that entity is actively making progress on the project. If the selected or proposing entity falls

in default of this standard, the project would be offered to the independent transmission sector.

2. The process remains sufficiently flexible so that the independent transmission sector can identify and propose projects of merit (as was the case with the TransBay Cable Project) that could meet a need that is identified by the process even if, at times, such a project is opposed by, or is otherwise not in the commercial interest of, one or more existing market participants.
3. The CPUC, CAISO, and CEC assure themselves that they have sufficient controls in place over the process, such that they can support the implementation of a project by the entity selected to develop it, even if an existing market participant is not sympathetic or is otherwise resistant to such a development, or indeed even if such an existing market participant desires or attempts to exert control or ownership of the developing project once a developer is designated.

Dated: January 5, 2005

Respectfully submitted,

National Grid USA

By its attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **NATIONAL GRID USA'S POST-WORKSHOP COMMENTS** on the parties listed on the attached service list in R.04-04-003 by using the following service:

E-Mail Service: sending the entire document as an attachment to all parties of record who provided electronic mail addresses.

U.S. Mail Service: mailing by first-class mail with postage prepaid to all parties of record who did not provide electronic mail addresses.

Executed on January 5, 2006 at San Francisco, California.

/S/
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