

Stakeholder Process: Interconnection Process Enhancements**Summary of Submitted Comments**

Stakeholders submitted four rounds of written comments to the ISO on the following dates:

- Round One: Issue Paper and Straw Proposal, 3/23/15, Comments received 04/13/15
- Round Two: Revised Straw Proposal 05/14/15, Comments received 06/02/15
- Round Three: Draft Final Proposal 07/06/15, Comments received 07/27/15
- Round Four: Revised Draft Final Proposal 8/27/15, Comments received 9/17/15

Stakeholder comments are posted at: <http://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=959C3E8E-7045-49CC-AE01-6CAD4DD3C299>

Other stakeholder efforts include:

- Web conference, 3/30/15
- Web conference, 5/18/15
- Web conference, 7/13/15
- Web conference, 9/3/15
- Numerous client services outreach calls

Management proposal	The Large Scale Solar Association	Pacific Gas and Electric	Modesto Irrigation District	Management response
<p>Affected systems – Establishes a 60 day timeline for an electric system operator to engage in the ISO generator interconnection process and affirmatively respond if it is an actual affected system. The proposal establishes what the ISO response will be if affected systems identify themselves outside of the notification window.</p>	<p>Supports with qualification.</p> <p>(1) Asserts that any late identification should only be accepted for changes to customer projects if the impact to the affected system is significant and material.</p> <p>(2) Asserts “legitimate reliability issue” should be a tariff defined term.</p> <p>(3) Asserts that PTOs should be required to identify and provide any existing agreements that are in place with affected systems, and that these agreements should be posted to the ISO website.</p> <p>(4) Asserts that the affected system should define impacts in their 60 day declaration.</p>	<p>Does not oppose.</p>	<p>Supports.</p>	<p>(1) The proposal allows for late identification by affected systems under certain limited circumstances. Under the circumstance where LSA has concerns, Management would recognize a newly self-identified affected system only where the customer changes the electric characteristics of its project. In that instance, Management believes the affected system should have the opportunity to ensure reliability on its system without having to meet a specific “significant and material” standard.</p> <p>(2) Given that reliability issues take many forms and could differ from one system operator to another, it would be impractical to define this in the tariff.</p> <p>(3) Management believes that agreements between PTOs and potential affected systems are outside of tariff authority and the ISO should not be responsible for obtaining copies and posting them on the ISO website.</p> <p>(4) It is not realistic to expect that an affected system would have the opportunity to enter into a study agreement with the interconnection customer and perform study work that would identify specific impacts a project may have on its system within the 60 day timeline.</p>

Management proposal	The Large Scale Solar Association	Management response
<p><u>Time in queue limitations -</u> Establish commercial viability criteria for projects to remain in the interconnection queue beyond the established seven years for cluster projects, or ten years for serial projects.</p>	<p>Supports with reservations.</p> <p>(1) Asserts that net qualifying capacity (NQC) list should be revised so that a project's status would be reflected as full capacity deliverability status (FCDS) for the partial capacity or project phase that meets commercial viability.</p> <p>(2) Asserts that there should be a formalized dispute resolution process when there is a dispute over which party has caused a delay in the project's development.</p> <p>(3) Asserts that commercial viability criteria should only be applicable when deliverability upgrades can be used by later queued projects.</p> <p>(4) Asserts there is not sufficient policy in place to address delivery network upgrades that are already under construction or already in service and are no longer needed because projects have been converted to energy only.</p>	<p>(1) Qualifying capacity is the foundation for determining NQC and a modification such as that being proposed by LSA would need to be made to the qualifying capacity in order to be reflected in the NQC. The CPUC determines qualifying capacity on a resource ID basis and any changes to the qualifying capacity calculation methodology would need to be made by the CPUC. If the entire project has only one resource ID and each phase of the project does not have full capacity deliverability status, then the project interconnection agreement designation is partial capacity deliverability status. However, if each of the project's phases have separate resource ID's then the project can be split in the NQC list such that one market resource ID may be designated as having full capacity deliverability status, another partial capacity deliverability status, or energy-only. The existing resource ID configuration option provides a solution to the concern without requiring the CPUC to revise the qualifying capacity calculation process.</p> <p>(2) Management believes that the proposal to include a tariff clarification of the PTO's obligation to provide notice of delay when the construction of network upgrades or interconnection facilities are delayed will alleviate this concern. If disagreements do arise, the Generator Interconnection Procedures already contain a dispute resolution process.</p> <p>(3) Management proposes to apply the commercial viability test when a project seeking a time extension beyond the maximum time in queue allowed by the tariff has either a reliability or deliverability network upgrade. Management believes the project's deliverability should still be released if it fails the commercial viability test regardless of whether it has a reliability or deliverability network upgrade that could be used by later queued projects as freeing up this capacity could provide an opportunity to other projects considering entering the queue.</p> <p>(4) Management believes that there is sufficient process in place, and that it will be rare that an upgrade will be determined not to be needed when it is partly constructed. The annual reassessment process will continue to determine if network upgrades are still needed given a change in deliverability status of a project.</p>