



Generator Interconnection and Deliverability Allocation Procedures (GIDAP)
Attachment A
Process Outline and Roadmap

This process outline and roadmap presents the flow of GIDAP activities from the perspective of an interconnection customer's generation project participating in a specific queue cluster. A new queue cluster is opened annually, and the entire process (up to but not including negotiation and execution of the interconnection agreement) takes roughly two years, which means that the GIDAP cycles for consecutive queue clusters will overlap as the GIP cycles do today. This outline does not try to represent the alignment of multiple overlapping GIDAP cluster cycles nor the alignment of the GIDAP with the ISO's annual transmission planning process (TPP). Please consult Attachment 1 to Dr. Zhu's testimony for a visual depiction of the alignment of the GIDAP cycles for consecutive queue clusters with each other and with the annual cycles of the TPP.

In comparing the GIDAP to the existing GIP, this process outline and roadmap focuses on the substantive provisions of each process and does not indicate any changes in the timing of the various activities. In general the ISO has attempted to retain the GIP timing, both for each of the major elements of the process and for the overall duration of the process, and has changed the timing only where necessary to allow sufficient time for new or modified activities or to better align with the TPP.

At a high level, the GIDAP and the GIP are structurally very similar. Both processes are built on the same sequence of major activities and interconnection financial security postings, with changes to many of the details as summarized in the table below and described in detail in this filing.

1. A window for submitting interconnection requests;
2. A Phase I study process;
3. A post-Phase I period for customers to review Phase I results, make key decisions affecting their participation in Phase II, and make the first interconnection financial security posting;
4. A Phase II study process;



5. A post-Phase II period for customers to review Phase II results, make key decisions affecting their interconnection agreements, and make the second interconnection financial security posting; and
6. Negotiation and execution of interconnection agreements.

Sequence of GIDAP activities	Comparison to existing Generator Interconnection Procedures (GIP)
<p>Interconnection customers submit interconnection requests for a new queue cluster ("cluster N"), and post study deposits.</p>	<p>Timing will change to align with ISO's transmission planning process (TPP).</p> <p>No changes proposed to request submission and study deposit requirements.</p>
<p>ISO performs Phase I studies, to identify:</p> <ul style="list-style-type: none"> • RNU and LDNU for all generation projects in the cluster, and • Incremental ADNU for an amount of new generation in each study area that exceeds the TP Deliverability inherent in the latest transmission plan by enough MW to trigger a significant network upgrade for the area. <p>When existing queue volume is very large in a grid area, Phase I study will model just enough new generation to exhaust available TP Deliverability and trigger the next significant incremental ADNU, rather than studying entire MW requested and driving unrealistic upgrades.</p>	<p>GIDAP classifies each Delivery Network Upgrade as either LDNU or ADNU, to distinguish "area" DNU mainly identified and approved in the TPP, from "local" DNU identified in the GIDAP study process.</p> <p>The ADNU concept provides the means for TPP, using the public policy-driven transmission category, to provide for deliverability needs for new generation development in TPP resource portfolio areas, thus bringing the approval of major ratepayer-funded transmission under a single holistic process (TPP).</p> <p>Whereas GIP Phase I would model the entire MW amount requesting deliverability status in a queue cluster to identify all DNU needs, GIDAP will model more reasonable MW amounts in areas where the queue is very large.</p> <p>Other aspects of Phase I study process remain the same as in GIP.</p>

Sequence of GIDAP activities	Comparison to existing Generator Interconnection Procedures (GIP)
<p>ISO provides Phase I results to customers.</p> <p>Projects seeking full capacity or partial capacity deliverability status elect Option (A) or (B).</p> <ul style="list-style-type: none"> Option (A) projects declare their need for ratepayer-funded deliverability. Option (B) projects declare willingness and ability to self-fund DNU without cash reimbursement. <p>Projects continuing to Phase II make first financial security posting. Projects electing Option (A) post security based on Phase I RNU and LDNU needs. Projects electing Option (B) post security based on Phase I RNU and LDNU needs, plus cost estimate for their share of incremental ADNU needs for their study area.</p>	<p>Phase I provides cost caps for RNU and LDNU, comparable to today's GIP, for all projects.</p> <p>GIDAP introduces Options (A) and (B) to allow projects to elect different paths in Phase II to fit their business models.</p> <p>In contrast to today's GIP, Phase I cost estimates for incremental ADNU do not provide cost caps for the Option (B) projects that might eventually be required to fund them. This is consistent with the design of Options (A) and (B).</p> <p>Projects have options to modify their MW size or deliverability status, comparable to today's GIP.</p> <p>Apart from different posting requirements for (A) and (B) projects with regard to ADNU, the posting requirements, including the security posting for PTO interconnection facilities, remain essentially the same as under the existing GIP.</p>
<p>ISO performs "reassessment study" to reflect status changes of earlier queued projects in the model and the study assumptions to be used for upcoming Phase II studies.</p>	<p>New feature introduced with GIDAP.</p> <p>Does not affect cluster N projects directly, but will affect the assumptions for their Phase II studies.</p> <p>The reassessment may indicate a need to update network upgrade requirements for earlier queued projects, and may lead to GIA revisions for those earlier queued projects.</p>
<p>ISO performs Phase II studies, to identify:</p> <ul style="list-style-type: none"> RNU and LDNU for all generation projects in Phase II, and Incremental ADNU for the Option (B) projects, assuming (worst case) that none of the TP Deliverability inherent in the latest transmission plan will be available for them. 	<p>Study model for Phase II study aligns with the (A) versus (B) distinction, such that (A) projects fully utilize the available TP Deliverability, so that (B) project will drive incremental ADNU.</p>

Sequence of GIDAP activities	Comparison to existing Generator Interconnection Procedures (GIP)
<p>ISO provides Phase II results to customers.</p> <p>Customers with active projects in queue, including both prior queue and new cluster, submit affidavits attesting to progress on specified development milestones, for ISO’s use in preparation for the allocation of TP Deliverability. ISO requires affidavit information to determine eligibility of projects to receive and retain allocations of TP Deliverability.</p>	<p>Phase II costs for RNU and LDNU are compared against Phase I costs to determine updated cost caps for these facilities, comparable to today’s GIP, for all projects.</p> <p>There are no cost caps on ADNU, but these costs affect only those Option (B) projects that are required to pay for the ADNU.</p> <p>As in the GIP, there are no cost caps for PTO interconnection facilities.</p>
<p>ISO determines MW amounts of TP Deliverability inherent in the latest transmission plan for each study area of the grid, and performs allocation of TP Deliverability to eligible generation projects.</p> <ul style="list-style-type: none"> • Step 1. ISO reserves some TP Deliverability for prior commitments of deliverability, e.g., for earlier queued projects. • Step 2. ISO allocates any remaining TP Deliverability to eligible projects in current cluster or parked from prior cluster. Both (A) and (B) projects in the current cluster are eligible on an equal basis. Where demand for TP Deliverability by eligible projects exceeds the amount available, projects are scored based on achieved development milestones and ISO allocates TP Deliverability to highest scoring projects. 	<p>Allocation of TP Deliverability is new to GIDAP. This design element is the mechanism whereby interconnection customers may utilize ratepayer-funded transmission to meet deliverability needs of their projects. TP Deliverability allocation supports the objectives of better management of large queue volumes, reduced ratepayer exposure to excessive transmission upgrade costs, and provision of deliverability created by ratepayer funded upgrades to the most viable generation projects in TPP resource portfolio areas. Interconnection customers whose projects are not allocated TP Deliverability may still interconnect with their desired deliverability status under Option (B).</p>
<p>ISO provides TP Deliverability allocation results to customers for eligible projects.</p> <p>Projects have various options open to them based on the allocation results and whether they are (A) or (B) projects.</p> <p>Option (A) projects have options to “park” their interconnection requests and participate in the TP Deliverability allocation process for the next queue cluster. Parking for one cycle allows reasonable time for projects to qualify for TP Deliverability while preventing them from remaining in queue indefinitely. (Other options available at this stage are fully described in the filing.)</p>	<p>These provisions are new under the GIDAP.</p> <p>Projects electing to withdraw from queue at this point have opportunities comparable to the GIP for partial refund of the first financial security posting, plus additional eligibility conditions for (A) and (B) projects to allow them to respond to new GIDAP outcomes.</p>

Sequence of GIDAP activities	Comparison to existing Generator Interconnection Procedures (GIP)
<p>Customers inform ISO of their elections on any of the available post-allocation options.</p> <p>ISO uses this information to prepare updates to Phase II study reports, to reflect impacts of project elections on network upgrade requirements.</p> <p>Customers make the second financial security posting.</p>	<p>These provisions are mostly new under the GIDAP.</p> <p>Second financial posting requirements are, for the most part, comparable to the requirements under the existing GIP.</p> <p>Projects that elect to “park” until the next cycle have 12-month extension to make full second posting.</p>
<p>Customers enter into LGIAs or SGIAs.</p>	<p>Process is unchanged from GIP.</p>
<p>Customers make third financial posting at start of construction activities for network upgrades or PTO interconnection facilities.</p>	<p>Process and requirements are unchanged from GIP, except for the addition of provisions to accommodate an Option (B) project that must pay for its DNU and elects to have an independent company, rather than the interconnecting PTO, construct the facilities.</p>