

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Interconnection Process Enhancements Draft Final Proposal for Topics 6-12 posted on July 2 and as supplemented by the presentation and discussion during the July 10 stakeholder web conference.

Submit comments to GIP@caiso.com

[Comments are due July 19, 2013 by 5:00pm](#)

The Draft Final Proposal for Topics 6-12 posted on July 2 may be found at:

http://www.caiso.com/Documents/DraftFinalProposal_Topics6-12_InterconnectionProcessEnhancements.pdf

The presentation discussed during the July 10 stakeholder web conference may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancementsJul10_2013.pdf

Following each topic listed below, the ISO poses specific questions and requests that stakeholders respond to each.

Topic 6 – Provide for ability to charge customer for costs to process a material modification request

Please select one of the following options to indicate your organization's overall level of support for the proposal on Topic 6:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

FULLY SUPPORT

The cost based approach is fair. In the future IEP would like to see the ISO provide a cap or a range as it becomes more knowledgeable about its costs in the matter. The ISO's proposal is consistent with IEP's position that allowing customers to decide how existing funds will be used is just and reasonable.

ISO's proposal is also consistent with IEP's position that funds in excess of those required for the assessment be returned immediately.

Topic 7 – COD modification provision for small generator projects

Please select one of the following options to indicate your organization's overall level of support for the proposal on Topic 7:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

SUPPORT WITH QUALIFICATIONS

IEP agrees that the concept embodied in this topic would be fair for small sized generation projects. IEP also supports the flexibility relative to the ability to make project changes envisioned in this portion of the proposal and that equitable treatment of small and large generators is justified.

IEP also appreciates the ISO's assessment of the potential unintended consequences regarding small projects that may be affiliated with the Renewable Auction Mechanism; however, IEP is not convinced that the scenario identified by the ISO is the only possible circumstance. As a result IEP supports the proposal with the qualification that the ISO commit to ensuring that small generation projects in the queue that are accessing the commercial market via the RAM and that apply for extension of their COD under this proposal will not receive, as a result of this proposal, greater queue benefits than would be afforded other SGIP projects.

Topic 8 – Length of time in queue provision for small generator projects

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 8:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

SUPPORT WITH QUALIFICATIONS

In concert with IEP’s response to topic #7, IEP supports this aspect of the proposal if the ISO can commit to ensuring that generation projects in the queue that are accessing the commercial market via the RAM and that apply for extension of their COD will not receive, as a result of this proposal, greater queue benefits than would be afforded other SGIP projects.

Topic 9 – Clarify that PTO and not ISO tenders GIA

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 9:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

FULLY SUPPORT

The language change is appropriate given that it reflects actual practice.

Topic 10 – Timeline for tendering draft GIAs

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 10:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

FULLY SUPPORT

The change in trigger date is reasonable given the understanding that necessary changes frequently arise between publication of study results and the results meeting.

Topic 11 – LGIA negotiations timeline

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 11:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

FULLY SUPPORT

The change in trigger date is reasonable given the change indicated in topic 10 above. IEP also believes that the reduction in time for the ISO to provide the final GIA is reasonable given it is a timeline primarily controlled by the ISO, subject of course to the IC supplying the necessary information to the ISO.

Topic 12 – Consistency of suspension definition between serial and cluster

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 12:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

OPPOSE

IEP understands that these generation projects may impose a risk to later queued projects; however, we oppose changing the tariff under which they have been operating as a means to force them out of the queue. Clearly, the definition of suspension for serial projects didn’t envision a situation where

GIA execution, or even substantial progress toward execution, would be so delayed and that is unfortunate.

Even so, IEP is not comfortable with the idea of retroactively changing the tariff on these customers knowing that any application to suspend by those projects will impact multiple customers and thus be denied, mandating their withdrawal from the queue.

Other comments

Stakeholders are asked to comment on any other aspects of the Draft Final Proposal for Topics 6-12 for which they would like to provide comments.