

## Stakeholder Comments Template

### Subject: Generation Interconnection Procedures Phase 2 (“GIP 2”)

Submitted by	Company	Date Submitted
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This template was created to help stakeholders structure their written comments on topics detailed in the May 27, 2011 *Draft Final Proposal for Generation Interconnection Procedures 2 (GIP 2) Proposal* (at <http://www.caiso.com/2b21/2b21a4fe115e0.html>). We ask that you please submit your comments in MS Word to [GIP2@caiso.com](mailto:GIP2@caiso.com) no later than the close of business on June 10, 2011.

Your comments on any these issues are welcome and will assist the ISO in the development of the revised draft final proposal. Your comments will be most useful if you provide the reasons and the business case for your preferred approaches to these topics.

Your input will be particularly valuable to the extent you can provide comments that address any concerns you foresee implementing these proposals.

Please note there are new topics in this comments template that have been introduced for the first time in the draft final proposal - Item # 18, 19, 20, 25, 26 & 27

**Comments on topics listed in GIP 2 Draft Final Proposal:****Work Group 1**

Based on the last round of work group meetings and our review of stakeholder comments, the ISO has determined that WG 1 topics should be taken out of GIP 2 scope and addressed in a separate initiative with its own timeline

**Work Group 2**

1. Participating Transmission Owner (PTO) transmission cost estimation procedures and per-unit upgrade cost estimates;

Comments:

2. Generators interconnecting to non-PTO facilities that reside inside the ISO Balancing Area Authority (BAA);

Comments:

**The tariff should clarify that demonstration of an agreement for firm transmission service from the generator's point of interconnection to the point of delivery to the ISO system is sufficient to ensure that there is adequate transmission on the non-PTO's transmission system for the project to be deemed fully deliverable. If a project has an executed contract for firm transmission service then the requirement for full deliverability to the ISO point of deliverability has necessarily been met. By codifying that a contract for firm transmission service meets the requirement for deliverability to the ISO, the uncertainty of a case-by-case evaluation is eliminated and these projects are put on an equal footing with other non-ISO projects that have firm transmission to the ISO.**

3. Triggers that establish the deadlines for IC financial security postings.

Comments:

4. Clarify definitions of start of construction and other transmission construction phases, and specify posting requirements at each milestone.

Comments:

5. Improve process for interconnection customers to be notified of their required amounts for IFS posting

Comments:

6. Information provided by the ISO (Internet Postings)

Comments:

### **Work Group 3**

7. Develop pro forma partial termination provisions to allow an IC to structure its generation project in a sequence of phases.

Comments:

8. Reduction in project size for permitting or other extenuating circumstances

Comments:

9. Repayment of IC funding of network upgrades associated with a phased generation facility.

Comments:

10. Clarify site exclusivity requirements for projects located on federal lands.

Comments:

11. CPUC Renewable Auction Mechanism

Comments:

12. Interconnection Refinements to Accommodate QF conversions, Repowering, Behind the meter expansion, Deliverability at the Distribution Level and Fast Track and ISP improvements

a. Application of Path 1-5 processes

Comments:

b. Maintaining Deliverability upon QF Conversion

Comments:

c. Distribution Level Deliverability

Comments:

#### **Work Group 4**

13. Financial security posting requirements where the PTO elects to upfront fund network upgrades.

Comments:

14. Revise ISO insurance requirements (downward) in the pro forma Large Generation Interconnection Agreement (LGIA) to better reflect ISO's role in and potential impacts on the three-party LGIA.

Comments:

15. Standardize the use of adjusted versus non-adjusted dollar amounts in LGIAs.

Comments:

16. Clarify the Interconnection Customers financial responsibility cap and maximum cost responsibility

Comments:

17. Consider adding a "posting cap" to the PTO's Interconnection Facilities

Comments:

18. Consider using generating project viability assessment in lieu of financial security postings

Comments:

19. Consider limiting interconnection agreement suspension rights

Comments:

20. Consider incorporating PTO abandoned plant recovery into GIP

Comments:

**Work Group 5**

21. Partial deliverability as an interconnection deliverability status option.

Comments:

22. Conform technical requirements for small and large generators to a single standard

Comments:

23. Revisit tariff requirement for off-peak deliverability assessment.

Comments:

24. Operational partial and interim deliverability assessment

Comments:

25. Post Phase II re-evaluation of the plan of service

Comments:

**New Topics since straw proposal**

26. Comments on the LS Power issue raised in their comments submitted May 9, 2011 – Re. Conforming ISO tariff language to the FERC 2003-C LGIA on the treatment of transmission credits in Section 11.4 of Appendix Z.

Comments:

27. Correcting a broken link in the tariff regarding the disposition of forfeited funds.

Comments:

**Other Comments:**

1. If you have other comments, please provide them here.