

Comments to Transmission Planning and Generator Interconnection Procedures Integration Revised Tariff Language, Posted April 19, 2012

Submitted by	Company	Date Submitted
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The purpose of the CAISO's TPP/GIP integration process is to prevent construction of unnecessary new delivery network upgrades for new projects coming in during Queue Cluster 5 and beyond, not to affect previously allocated deliverability rights on *existing* transmission lines. As drafted, however, Section 8.9.1 does not adequately protect such rights.

Specifically, the new tariff language should be clear that it does not allocate deliverability rights associated with existing transmission facility capacity for which full capacity or partial deliverability already exists. In other words, a pre-Cluster 5 project should be able to rely upon existing deliverability at least for the portion of its capacity for which adequate transmission capacity already exists and for which new Delivery Network Upgrades would not be triggered.

Proposed language for the tariff amendment is included below:

8.9.1 First Component: Representing TP Deliverability Used by Prior Commitments

The CAISO will identify the following commitments that will utilize MW quantities of TP Deliverability:

- (a) The proposed Generating Facilities corresponding to earlier queued Interconnection Requests meeting the criteria set forth below:
 - (i) proposed Generating Facilities in Queue Cluster 4 or earlier that have executed and approved PPAs with Load-Serving Entities and have GIAs that are in good standing.
 - (ii) proposed Generating Facilities in Queue Cluster 5 and subsequent Queue Clusters that were previously allocated TP Deliverability and have met the criteria to retain the allocation set forth in Section 8.9.4.

(b) the portion of capacity for which a Generating Facility in Queue Cluster 4 or earlier with a GIA has Partial Deliverability and for which Delivery Network Upgrades are not required;

(b) (c) any Maximum Import Capability included as a planning objective in the Transmission Plan;

(e) (d) any other commitments having a basis in the Transmission Plan.

Respecting partial deliverability for pre-Cluster 5 projects is especially important where actions of the CAISO and the CPUC subsequent to execution of the GIA have prevented the generator from receiving full deliverability for all of the capacity requested for the project. Accordingly, the CAISO may want to limit its protection of Partial Deliverability to such situations.

We further appreciate that the CAISO may not want to protect such pre-existing deliverability rights indefinitely in situations where the projects lack PPAs or are not progressing toward commercial operation. Accordingly, the CAISO may want to include a sunset provision for this amendment, perhaps through the conclusion of Cluster 6 TP Deliverability allocation processes.