

# Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the stakeholder initiative:

## **“2017 Expedited GIDAP Enhancements Straw Proposal”**

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due Wednesday, September 13, 2017 by 5:00pm**

The Issue Paper posted on July 21, 2017, the Revised Issue Paper posted on August 30, 2017, and the presentations discussed during the September 7, 2017 stakeholder meeting can be found at CAISO.com or at the following link:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/2017ExpeditedGIDAPEnhancements.aspx>

Please use this template to provide your written comments on the issue paper topics listed below and any additional comments that you wish to provide.

1. Do you support the Extended Parking straw proposal? And why?

**Comments:** MID cannot say it supports or does not support the Extended Parking straw proposal at this time. In its August 11, 2017 Comments, MID raised the concern that the additional year that would be permitted to park a project would disadvantage Affected Systems, as well as other projects that have impacts on Affected Systems.

The CAISO’s August 30, 2017 Revised Straw Proposal responded to MID’s August 11, 2017 Comments as follows:

Modesto Irrigation District (MID) shared that there is likely impact to affected systems and requests that criterion 2 also include upgrades that impact affected systems. The ISO respects the concern that certain upgrades may impact affected systems beyond the first year of parking and notes that reliability impacts on affected systems must be mitigated regardless of TP Deliverability or time in queue. The ISO invites MID to explain in detail how the additional year of parking could complicate issues for affected systems.

Revised Straw Proposal at 15. MID explained its thinking further during the September 6, 2017 stakeholder call, and provides further context below.

Under the CAISO's proposal, an additional year of parking will not be permitted under the following condition:

If a project has a network upgrade assigned to it, which is needed by a later clustered project(s), parking for a second year will not be allowed. The ISO does not believe that it is prudent for the second-year parking option to prolong the uncertainty associated with the very real risk that either later clustered projects or the PTO become required to finance an upgrade as a result of the parked project's delay.

Revised Straw Proposal p. 12 (footnote omitted). The CAISO describes this condition as its Criterion 2. MID asked whether the criterion should also be applied mitigation upgrades for Affected Systems.

To illustrate, MID has reviewed the impacts to MID of projects seeking to interconnect to CAISO facilities by analyzing the projects within the same cluster groupings as the CAISO uses to analyze its own interconnection studies. Some of MID's studies have revealed that multiple projects planning on coming on-line at approximately the same time period would all have impacts to varying degrees on MID. To the extent that mitigation through the construction of electric upgrades is a feasible means to address the impacts, the financial responsibility for those upgrades can be allocated to those projects on a percentage basis based on projected flows or other methodologies.

Now assume a project within a Cluster parks for an extended period. Assume that the remaining projects still will impact MID as an Affected System, and assume that the

mitigation available is not readily sized down to account for the impacts caused by a slightly smaller group of projects. MID has several choices on how to deal with the impacts of the remaining projects. First, MID can reallocate the mitigation responsibilities based on the assumption that the parked project is not with the Cluster. However, this outcome is unfair to the non-parked projects, as they may become responsible for a higher percentage, and the parked project can evade responsibility. Second, MID could “hold” the parked project’s allocation of financial responsibility to be paid by the parked project when it comes on-line, but to the extent a later Cluster/queued project is able to come on-line quicker than the parked project, there may be debate as to whether the later project should be liable in lieu of the parked project, which may also be an unfair outcome, assuming that the addition of the parked project does not result in reliability impacts to MID. Third, MID could “hold” the parked project’s allocation of financial responsibility to be paid only by the parked project, irrespective of whether other projects come on-line before the parked project. However, the risk remains that, over the extended period, the parked project may withdraw its project. In that case, MID may need to re-allocate the difference to the non-parked projects, which is disadvantageous to the non-parked projects, which are attempting to reach finality of their financial liability early for purposes of obtaining and maintaining financing.

While MID agrees with the CAISO that, “reliability impacts on affected systems must be mitigated regardless of TP Deliverability or time in queue,” a question with the extended parking proposal is whether the risk for financial responsibility for mitigating those reliability impacts is shifted to other interconnecting projects or to the Affected Systems themselves. As indicated above, while Affected Systems and projects can work to reduce the risks to all parties contractually, the extended parking proposal does not simplify the interconnection process, but instead may create more challenges for developers seeking certainty in order to obtain financing, and for Affected Systems seeking to ensure that their ratepayers are made whole for required mitigation activities undertaken for facilities that are not intended to provide services to the Affected System’s ratepayers. For these reasons, MID requests the CAISO to incorporate coordination with Affected Systems into the scope of Criterion 2.

2. Do you support the Interconnection Request (IR) Window & Validation Timelines Straw Proposal? And why?

**Comments:** [Insert comments here]