

interconnecting through SDG&E's WDAT procedures request deliverability status on the ISO controlled grid, which is studied pursuant to the ISO's interconnection procedures. As such, the ISO has an interest in this proceeding that cannot be adequately represented by any other party. Accordingly, the ISO requests that the Commission permit it to intervene in this proceeding.

II. Comments

The ISO supports SDG&E's proposal to amend its WDAT interconnection procedures in order to harmonize those procedures with the interconnection procedures that the Commission has approved for the ISO. Harmonization of SDG&E's and the ISO's procedures are important with respect to such things as the timing of queue cluster windows and study cycles. In particular, both sets of procedures provide for SDG&E and the ISO to undertake parallel and sometimes interrelated activities, such as the work which must be done for customers interconnecting pursuant to SDG&E's WDAT that seek deliverability on the ISO controlled grid.

In reviewing the specifics of SDG&E's proposed tariff provisions, the ISO is generally supportive of the revisions contained in the WDAT amendment filing. However, the ISO believes that a few modifications should be made to SDG&E's proposal to better ensure the harmonization of SDG&E's procedures with those of the ISO.

First, in several places in its WDAT, SDG&E includes references to the interconnection procedures set forth in Appendix Y to the ISO Tariff. However, as noted by SDG&E in its transmittal letter, on July 24, 2012 in Docket No. ER12-1855

the Commission conditionally approved the ISO's revisions to its transmission planning and generator interconnection procedures ("TPP-GIP"), including the Generator Interconnection Deliverability Allocation Procedures (Appendix DD to the ISO tariff). As a result, projects entering the ISO queue are now studied pursuant to Appendix DD, rather than Appendix Y. Appendix DD also governs the allocation of deliverability to projects, including projects interconnecting pursuant to SDG&E's WDAT procedures. Therefore, the references to Appendix Y of the ISO tariff in SDG&E's WDAT are no longer current. The ISO believes that the best solution, in order to avoid the potential for future conflicts, is to substitute generic references to the ISO's interconnection procedures.¹

Second, in Attachment H, Section 4.5.4.2.1 of the WDAT amendment, SDG&E states that "The On-Peak Deliverability Assessment shall determine the Interconnection Customer's Generating Facility's ability to deliver its energy to the CAISO grid, as applicable, under peak load conditions, and identify *preliminary Reliability Network Upgrades (as defined in the CAISO Tariff)*, Area Delivery Network Upgrades (as defined in the CAISO Tariff) and Local Delivery Network Upgrades (as defined in the CAISO Tariff) required to provide the Generating Facility with Full Capacity Deliverability Status."² However, the On-Peak Deliverability Assessment conducted by the ISO only identifies Delivery Network Upgrades, not Reliability Network Upgrades.³ Therefore, the reference to Reliability

¹ If SDG&E believes that citations to specific provisions are nevertheless necessary in certain instances, then those citations should refer to Appendix DD.

² Emphasis added.

³ See ISO Tariff, Appendix DD, Section 6.3.2.1.

Network Upgrades in Attachment H, Section 4.5.4.2.1 of SDG&E's WDAT should be removed.

Finally, Attachment H, Section 6.3 (Interconnection Metering) of SDG&E's proposed WDAT amendment states that "any metering necessitated by the use of the Generating Facility shall be installed at the Interconnection Customer's expense in accordance with FERC, state, or local regulatory requirements or the Distribution Provider's specifications." This section should also include a reference to the metering requirements set forth in the ISO's tariff. Although any applicable ISO metering requirements would arguably be encompassed by the reference to "FERC requirements," it is important that interconnection customers are explicitly aware that in addition to SDG&E's own metering requirements, they may also need to meet metering requirements set forth in the ISO's tariff.⁴

III. Communications

The ISO requests that all communications and notices regarding this filing and this proceeding be provided to:

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⁴ For instance, resources interconnecting pursuant to SDG&E's WDAT that are 1 MW or greater in size must also have a participating generator agreement and meter service agreement with the ISO. This requirement also applies to resources between 500kW and 1 MW if they wish to participate in the ISO's markets.

IV. Conclusion

For the reasons stated above, the ISO requests that the Commission grant the ISO status as an intervenor and approve SDG&E's WDAT amendment, subject to SDG&E making the modifications set forth herein.

Respectfully submitted,

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Dated: March 28, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Washington, D.C., this 28th day of March, 2014.

/s/ Michael Kunselman
Michael Kunselman