

## 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 April 14, 2011 *Straw 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 May 5, 2011.

Your comments on any these issues are welcome and will assist the ISO in the development of the 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 greater definition and clarity to each of the proposals as well as concerns you may have with implementation or effectiveness.

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

1. Develop procedures and tariff provisions for cost assessment provisions.

Comments:

NCPA strongly supports CAISO's decision to categorize this topic as a high priority issue under the GIP-2 stakeholder initiative. NCPA believes that CAISO must work towards coordinating interconnection requests processed under the Generation Interconnection Procedures (GIP) with the CAISO Transmission Planning Process (TPP). Such coordination is necessary to ensure the most cost effective transmission upgrades are built to satisfy California's renewable development goals. NCPA also believes that it is very important to develop proper incentives for renewable generators to develop projects that maximize the use of existing and new transmission facilities to avoid stranded investments, and to minimize the total cost of transmission upgrades that are funded by California ratepayers. In this regard, NCPA supports the comments filed by the Bay Area Municipal Transmission Group (BAMx) and the City and County of San Francisco (CCSF) in this stakeholder initiative. NCPA encourages CAISO to consider the proposal offered by BAMx and CCSF regarding the development of an economic test to ensure that load is only required to bear the cost of network upgrades that provide a measurable benefit to load.

2. Clarify Interconnection Customer (IC) cost and credit requirements when GIP network upgrades are modified in the transmission planning process (per the new RTPP provisions)

Comments:

No comments at this time.

**Work Group 2**

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

8. Information provided by the ISO (Internet Postings)

Comments:

No comments at this time.

**Work Group 3**

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

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

- a. Fast Track application to facility repowerings

Comments:

No comments at this time.

- b. QF Conversion

Comments:

No comments at this time.

- c. Behind the meter expansion

Comments:

No comments at this time.

- d. Distribution level deliverability

Comments:

No comments at this time.

**Work Group 4**

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

Comments:

No comments at this time.

15. 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:

No comments at this time.

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

**Work Group 5**

19. Partial deliverability as an interconnection deliverability status option.

Comments:

No comments at this time.

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

Comments:

No comments at this time.

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

Comments:

No comments at this time.

22. Annual updating of ISO's advisory course on partial deliverability assessment

Comments:

No comments at this time.

23. CPUC Renewable Auction Mechanism requirement for projects to be in an interconnection queue to qualify

Comments:

No comments at this time.

**Other Comments:**

1. Provide comments on proposals submitted by stakeholders.
2. If you have other comments, please provide them here.