

## 2017 Expedited GIDAP Enhancements

Submitted by	Company	Date Submitted
John Newton <a href="mailto:jans@pge.com">jans@pge.com</a> ; (415) 973-1609	Pacific Gas and Electric Company	August 11, 2017

PG&E appreciates the opportunity to comment on the CAISO’s 2017 Expedited GIDAP Enhancements Issue Paper and Straw Proposal (the “proposal”), published on July 24, 2017.

### **Extended Parking**

PG&E appreciates the CAISO’s efforts to maintain and improve effective queue management as the procurement needs for many LSEs continue to change. Fundamentally, effective queue management should result in viable interconnection projects proceeding to commercial operation, and non-viable projects should withdraw from the interconnection queue.

PG&E would appreciate the CAISO clarifying the following points regarding the proposal:

- What would be the interaction between interconnection agreement tendering and the parking extension?
- How is the proposed extra-year parking option more effective than a project seeking a material modification application that extends the project schedule by one or more years?
- Between the extended parking proposal and an MMA, which does CAISO consider is more useful to ensure that non-viable projects timely withdraw from the queue?

PG&E appreciates the CAISO’s inclusion of Criterion 2. Further detail may be necessary, either in tariff or BPM development. Regardless, CAISO should ensure that conditioning eligibility to extend parking for an additional year based on the interconnection project having no assigned network upgrades (apart from area network upgrades) does not shift costs to later-queued projects or to PTOs and their customers.

### **Interconnection Request Window & Validation Timelines**

PG&E views the recommendation to change the interconnection request window from thirty days to 15 days and to lengthen the time for validation and correction by 15 days as an opportunity to more effectively review interconnection requests within the interconnection process timeframe. PG&E has experienced similar challenges from the increased complexity and variety of interconnection requests in recent years, and supports the CAISO’s proposal.