2017 Expedited GIDAP Enhancements

Submitted by	Company	Date Submitted
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PG&E supports the first topic in the Revised Expedited 2017 GIDAP Enhancements Straw Proposal ("revised proposal"), which narrows the interconnection request application window and extends the period for review of these applications.

However, PG&E is concerned with the second topic in the revised proposal, which would allow an interconnection project to extend its parking for a second year where that interconnection project does not have network upgrades needed for later-cluster interconnection projects. We encourage the CAISO to consider the effect on shared network upgrades needed for two or more interconnection projects within a single queue cluster where one of the interconnection projects seeks to park for a second year. We also request that the CAISO clarify the interaction of the parking proposal and Section 13 of Appendix DD of the CAISO Tariff. Sections 13.1.1 and 13.2.1 make it clear that if a project delays the interconnection of other projects, they can be withdrawn by the CAISO. PG&E notes that a project with shared upgrades within the same cluster would delay the other dependent projects by parking and would thus either need to proceed to an executed IA and accept the charges for their portion of the shared network upgrade or be withdrawn. PG&E suggests precluding such a possibility by excluding interconnection projects with shared network upgrades (in a single given interconnection queue cluster) from being eligible to park for a second year.