



Comments of Pacific Gas and Electric Company TPP-GIP Draft Tariff Language

Submitted by	Company	Date Submitted
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Pacific Gas & Electric Company (PG&E) appreciates the opportunity to participate in the Tariff language development for the California Independent System Operator’s (CAISO) Transmission Planning Process (TPP) Generator Interconnection Process (GIP) Integration Initiative. Overall, PG&E believes that this draft Tariff language begins to appropriately implement the proposal that was approved by the Board, but notes that this draft does not seem complete. While the posted language includes significant changes to Appendix Y, there is nothing posted for Sections 24 and 25 of the main body of the Tariff, and no updates to the pro forma SGIA and LGIA. PG&E requests that a timeline be posted to assure stakeholders that sufficient input will be incorporated into the final language before it is filed with FERC.

Further Comments:

Draft language for the pro forma LGIA and SGIA, should be posted as soon as possible

As the CAISO itself states, necessary modifications have not yet been made to the forms attached to the Appendix Y template nor to the pro forma LGIA and SGIA. In the draft language posted on 3/22, the CAISO stated that it anticipated posting these modifications by 3/29, but no language for these sections has been posted as of 3/30. This draft language should be posted as soon as possible so stakeholders can give meaningful feedback on the stakeholder call on 4/4.

In addition to modifications to the pro forma SGIA and LGIA, PG&E requests a list of additional sections the CAISO plans to modify

It seems that in addition to the sections mentioned above, there may be sections in the main body of the Tariff that require significant modifications (ex: Sections 24 (TPP) and 25 (Generator Interconnections)). PG&E requests a full list of additional sections the CAISO plans to modify beyond the new Appendix Z which it posted on 3/22.

Section 3.5.1.1b – PG&E supports providing the incentive of full refunds of study deposits (less any costs already incurred) for projects that wish to withdraw. However, the CAISO should confirm that the 10-day cutoff is simply to be eligible for a full refund and does not mean that the interconnection customer would receive the reimbursement within 10 days. The current timeframe in the master agreement gives PTOs 75 days to send an invoice to the CAISO. This 75 day timeframe for sending actual reimbursement should be maintained.

Section 6.3.1 - *“The CAISO, in coordination with the applicable Participating TO(s), shall also perform power flow analyses, under a variety of system conditions, for each Interconnection Request either **individually** or as part of a Group Study to identify Reliability Criteria violations”.*

PG&E requests clarification as to what “individually” means in this context. In the past, PG&E has not completed individual studies for RNUs as part of the Cluster Process. PG&E would like to be clear that this should not be an expectation of interconnection customers, and that instead they will be assigned a pro-rata share of the Group Study estimates.

“The cost of all RNUs identified in the Phase I Interconnection Study shall be estimated in accordance with Section 6.4. The estimated costs of short circuit related RNUs identified through a Group Study shall be assigned to all Interconnection Requests in that Group Study pro rata on the basis of the short circuit duty contribution of each Generating Facility. The estimated costs of all other RNUs identified through a Group Study shall be assigned to all Interconnection Requests in that Group Study pro rata on the basis of the maximum megawatt electrical output of each proposed new Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request.”

PG&E suggests that for non-short circuit RNUs, the option should exist to use generation distribution factors or flow impact methods. For RNUs that involve re-conductoring or any flow-based voltage/stability/reactive power issues, the current pro-rata based on MW size is appropriate.

Section 6.3.2.1 – *“The Deliverability Assessment will consist of **two rounds**, the first of which will identify any transmission constraints that limit the deliverability of the Generating Facilities in the Group Study and to identify LDNUs to relieve the local constraints, and second of which will determine ADNUs to relieve the area constraints.”*

PG&E requests clarification as to which study methodology will be used during the first round vs. the second round for the Deliverability Assessment. Will the study methodologies be the same? If the CAISO plans to include this level of detail in the BPMs instead of the Tariff itself, it should make that clear in this section.

Section 7 – PG&E requests that the CAISO include language that requires updated technical data in the form of Attachment 1 to Appendix A of interconnection request. Such technical data should include all associated diagrams/epc/dyd files. This additional data will help PTOs to model these generators more accurately in the power flow base case.

Section 7.3 – PG&E requests clarification regarding how the Phase 2 cost caps are defined. Are LDNUs and RNUs part of a single cost cap or are there individual cost caps for each type of upgrade?

Section 8.9 - PG&E supports implementing the ranking criteria through the BPMs as it will give the CAISO flexibility to adapt the ranking criteria as market conditions change or new viability screens emerge. However, PG&E suggests that the CAISO include in the Tariff a commitment to publish the amount of deliverability capacity it found to be available.

The CAISO states that it will issue a market notice to notify parties of the timeline for this allocation, but makes no mention of publishing the available deliverability capacity to be allocated, and the amount that was determined to be encumbered by earlier-queued projects. It is PG&E’s understanding that the studies to determine available capacity will be conducted as part of the GIP Phase 2 studies. The CAISO should either include the details of this complimentary study in this Appendix Z, or in Section 25 of the main body of the Tariff.

Section 10.3 .2.4 – The removal of this provision does not seem to be part of the TPP-GIP proposal approved by the CAISO Board. PG&E requests an explanation of why the CAISO propose to remove this section.

Section 10.4.2.1- The words “plus” and “less” should be included inside the parentheses, or the parentheses should be eliminated to make the sentences more clear.

Attachment A to Appendix 1 - Items 2A and 2C should explicitly state “as measured at the generator terminals” or something to that effect to avoid confusion with “net to the grid” or “net to the Point of Interconnection (POI),” which is what many ICs incorrectly assume this number means. The CAISO queue should list the value from 2C, but ICs should be made aware that this does not mean net MW to the POI.

PG&E also suggests that the CAISO consider making the entire Attachment 1 conform to the WECC Data Preparation Manual (DPM) guidelines, as well as the WECC Wind and PV Solar modeling guidelines for equivalent collector system impedances, transformer equivalents, etc. Conforming to these WECC guidelines will help ensure consistency between GIP and TPP modeling.