

# Market and Infrastructure Policy

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**Policy Initiatives Catalog Submission Form** 

## California ISO Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager

Date: 7/1/2018

#### **Submitter Information**

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#### Please provide a title for the issue.

Sunset for the Reimbursement of Network Upgrades

## Please provide a summary description of the issue (i.e. 500 words)

FERC Order No. 2003 formalized the policy to reimburse 100% of Network Upgrades to Interconnection Generators. Within the CAISO territory, this order has been successful in providing incentive for the development of non-utility generation.

Given that reimbursement of Reliability Network Upgrades has been limited since Cluster 5, and we have now entered Cluster 11, PG&E would like to encourage discussion of whether generators in the CAISO control area should continue to receive \$60,000 / MW for Reliability Network Upgrades and 100% reimbursement for Local Delivery Network Upgrades. This is especially pertinent given the reality that MISO and NE ISO have all either stopped refunding or have severely reduced refunds of monies advanced for the building of Network Upgrades.

It appears to PG&E that the subsidization of generation interconnection is no longer necessary and is therefore unfairly burdening California ratepayers. This proposal will require updates to the CAISO Tariff Appendix DD Section 14.3.2.1 Repayment of Amounts Advanced Regarding Non-Phased Generating Facilities.

Please provide any data/information available that would characterize the importance or magnitude of the issue.

PG&E FERC Form 1: Account 252, Document Page 113:

https://www.pge.com/pge\_global/common/pdfs/about-pge/company-

information/regulation/FERCForm1.pdf

MISO FERC Docket No. EL12-104-000:

https://www.ferc.gov/whats-new/comm-meet/2013/071813/E-3.pdf

NE ISO OATT: https://www.iso-ne.com/static-

assets/documents/regulatory/tariff/sect\_2/oatt/sect\_ii.pdf

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