

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Draft Final Proposal paper posted on September 4, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due September 24, 2018 by 5:00pm

The Draft Final Proposal posted on September 4, 2018 and the presentation to be discussed during the September 17, 2018 stakeholder meeting can be found on the CAISO webpage at the following link:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>

Please use this template to provide your written comments on the Draft Final Proposal topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Draft Final Proposal paper for convenience.

6. Generator Interconnection Agreements

6.2 Affected Participating Transmission Owner

In scenarios where a generator causes upgrades to both the interconnecting PTO and an affected PTO, the current GIDAP must be updated to provide a clear process for generators, PTOs, and the CAISO. PG&E believes that the revised straw proposal requiring separate cost estimates for PTO and any affected PTOs documented in interconnection studies, GIA or affected PTOs' facilities agreement is an effective solution. Since no generation projects fall in this category and there is no consensus among the stakeholders, PG&E supports the CAISO deferring this issue to the next IPE process.

6.4 Ride-through Requirements for Inverter based Generation

PG&E is supportive of the CAISO's proposed modifications to the technical requirements for the interconnection of inverter-based generation to the CAISO controlled grid.

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

PG&E is supportive of the revised proposal for Maximum Cost Responsibility for Network Upgrades and Potential Network Upgrades. The structure developed for cost responsibility is clear and the differentiation between Precursor Network Upgrades and Potential Network Upgrades are helpful in delineating the financial responsibilities between generation customers and the PTOs'.

7.7 Reliability Network Upgrade Reimbursement Cap

PG&E is concerned that the CAISO has observed an instance where a gaming opportunity exists but has determined it will not develop a mechanism to prevent the opportunity. PG&E appreciates the monitoring of its queue for projects that might abuse the intent of the reimbursement cap policy. PG&E would like to know how the CAISO will monitor the situation to prevent the issue from occurring.

PG&E supports the escalation of the \$60,000 per MW reimbursement cap starting with its implementation in 2012. PG&E requests clarification on whether or not CAISO intends the change to be retrospective (or prospective).

10. Additional Comments