# Stakeholder Comments Template

| Submitted by | Company | Date Submitted |
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Please use this template to provide your written comments on the stakeholder initiative:

## "2017 Expedited GIDAP Enhancements Straw Proposal"

Submit comments to InitiativeComments@CAISO.com

## Comments are due Friday, August 11, 2017 by 5:00pm

The Issue Paper posted on July 21, 2017 and the presentations discussed during the August 4, 2017 stakeholder meeting can be found at CAISO.com or at the following link:

http://www.caiso.com/informed/Pages/StakeholderProcesses/2017ExpeditedGIDAPEnhancements.aspx

Please use this template to provide your written comments on the issue paper topics listed below and any additional comments that you wish to provide.

1. Do you support the Extended Parking straw proposal? And why?

   **Comments:** No, SCE does not support the Extended Parking Straw Proposal. SCE does not believe there is a compelling case to extend parking, especially given that the proposal runs counter to CAISO's increased emphasis on queue management that we have seen over the past 12 months.  Extending parking means that projects without PPAs will be allowed to linger longer in the queue while they wait to see whether they will somehow secure a PPA.  The only benefit of this proposal appears to be accruing to projects that do not have a PPA.  Those projects that are in the interconnection process and have secured a PPA aren't interested in further parking.  Those projects that have recently entered the interconnection process (and all that follow the implementation of this proposal) face increased uncertainty in regards to whether upgrades required by, but not included in an executed GIA for projects that are moving towards

commercialization. Allowing additional parking defers the inevitable withdrawal of a non-viable project that will never receive a PPA (a subset, for sure, of those that will take advantage of extended parking), which in turn adds to the overall churn and uncertainty for all other parties, as required upgrades get stacked up without certainty as to which party will ultimately bear financial responsibility.

The same concerns exist now as when the interconnection customer's option to park was implemented in the GIDAP in 2012 regarding non-viable projects remaining in the interconnection queue and increasing uncertainty with respect to network upgrades and cost responsibility. As the CAISO states in its Draft Issue Paper & Straw Proposal, "… a longer parking period could render the Phase II study results for the parked projects obsolete. Moreover, refreshing the study results every year would maintain a potentially large volume of projects in the study process and would exacerbate the problems caused by excessive queue size. The ISO thus concluded that the ability to park for only one allocation cycle struck an appropriate balance between allowing potentially viable Option (A) projects a second chance in the process for allocating TP Deliverability and preventing less viable projects from lingering in the queue and complicating the study process."[1]

The only way that SCE could support this proposal is to require a substantial increase in viability milestones, such as the execution of the GIA and/or increase in the amount of financial security posting above the second posting amount as a prerequisite to being able to park for the additional year.

2. <u>Do you support the Interconnection Request (IR) Window & Validation Timelines Straw Proposal? And why?</u>

**Comments:** Yes, SCE supports the IR Window and Validation Timelines Straw Proposal. Given recent experience with Cluster Interconnection Request (IR) windows, significant time is wasted where there have been no IRs submitted for the first two weeks of the request windows. Reducing the time period for submitting IRs to roughly two weeks, which would capture 80% and 94% of the IRs in the last two request windows, respectively, and increasing by an equivalent interval the time for review, correction, and validation of the IRs, would accommodate a more efficient processing of all IRs. With the increasing complexity of interconnection requests and interconnection customers seeking changes to their requests, the additional time for review, correction, and validation will reduce the probability of a project not being validated in time for the Phase I studies.

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[1] CAISO's 2017 Expedited GIDAP Enhancements Draft Issue Paper & Straw Proposal, July 24, 2017, page 8.