

# 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](mailto:InitiativeComments@CAISO.com)

**Comments are due Wednesday, September 13, 2017 by 5:00pm**

The Issue Paper posted on July 21, 2017, the Revised Issue Paper posted on August 30, 2017, and the presentations discussed during the September 7, 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.

Fundamentally, SCE does not believe there is a valid urgent concern regarding the duration an interconnection customer is able to “park” which would require resolution of any parking-related issue on an expedited basis. SCE disagrees the data in Figure 1 reveals that the percentage and number of projects that parked has been “*steadily increasing*”<sup>1</sup>. As pointed out in the Revised Straw Proposal, there was actually a decrease in the percentage and number of projects that parked between Cluster 5 and Cluster 6. Also, the percentage change of projects that parked between Cluster 7 (~31%) and Cluster 8 (~34%) remained relatively flat. Further, if

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<sup>1</sup> CAISO’s 2017 Expedited GIDAP Enhancements Revised Straw Proposal, p. 8.

Cluster 6 is the baseline year for incremental increases in the percentage and number of projects that parked, an increase in two consecutive clusters (i.e. Clusters 7 and 8) is an opaque trend, at best.

SCE reiterates its concerns regarding non-viable projects remaining in the interconnection queue and increasing uncertainty with respect to network upgrades and costs responsibility. The extended parking proposal would allow non-viable projects to linger (rather than withdraw) in the interconnection queue for one additional year, compounding the uncertainty in the cluster study process. To speculate on the possibility of a generator either securing a PPA or being short-listed in a future solicitation from a Load Serving Entity by extending the parking opportunity for one additional year is not reasonable. The consequences of doing so would be an increased risk of transferring cost responsibility associated with network upgrades to a later-queued interconnection customer or the upfront financing responsibility to a PTO, which SCE opposes. Although Criterion 2 and the proposed requirement that a project will have to come out of parking to be tendered a GIA (or suspend negotiations if a GIA has already been tendered) mitigate some of the PTO upfront financing risk, extending parking another year increases upfront funding risk for PTOs relative to the current parking rules.

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

**Comments:** Yes, SCE supports the IR Window and Validation Timelines straw proposal.

The proposed revised timelines would accommodate a more efficient processing of all interconnection requests.