

## “2017 Expedited GIDAP Enhancements Straw Proposal”

Submitted by	Company	Date Submitted
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### SDG&E’s Comments on CAISO’s 2017 Expedited GIDHAP Straw Proposal

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:**

SDG&E does not support extending the existing parking period.

While SDG&E agrees that extending the parking period by 12 months *could* result in more prospective generators “being ready to provide offers” if, and when, Load Serving Entities’ “procurement process[es] ramp[] up,” such an extension alone does not ensure such a result. And, based on SDG&E’s recent experience in running multiple power related RFOs, the current parking period generally does not preclude prospective generators from providing offers in a procurement process.

Historically, SDG&E’s procurement processes for mature product types (such as renewables and conventional resources) have conditioned eligibility to submit offers on completion of Phase II interconnection studies, not on having received a TP deliverability allocation. Further, a prospective generator always has the option of self-funding network upgrades necessary to achieve Full Capacity Deliverability Status (FCDS); i.e., constructing network upgrades as true “merchant” transmission (Option (B)).

SDG&E does not believe the existing parking period is harmful to the competitive offer processes. However, SDG&E is concerned with the efficacy of the current interconnection study process: With limited exceptions, the study process is required to assume that all generators in the CAISO interconnection queue will be built as planned.

This requirement can lead to the identification of unrealistic Reliability Network Upgrades (RNUs) and Delivery Network Upgrades (DNUs). Extending the existing parking period by another twelve months will result in even more prospective generation in the queue, and even more unrealistic interconnection study results.

As the CAISO's July 24, 2017 "*2017 Expedited GIDAP Enhancements, Draft Issue Paper & Straw Proposal*" notes, the existing parking period was designed to strike a

“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.” (page 8)

SDG&E believes the existing parking period continues to strike the appropriate balance.

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

**Comments:**

SDG&E supports shortening the IR window and expanding the IR validation period.

It does not appear that this proposed change will impose any real burden on prospective generators' ability to timely submit interconnection requests. Additionally, the proposed change will provide more time in which to cure deficiencies in the interconnection requests, and will not shorten the time the CAISO and PTOs have to conduct the required interconnection studies.