

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 Revised Straw Proposal posted on July 10, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due July 31, 2018 by 5:00pm

The straw proposal posted on July 10, 2018 and the presentation discussed during the July 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 Issue Paper topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Issue Paper for convenience.

4. Deliverability

4.1, 4.2, 4.3, 4.5 and 9.2 Transmission Plan Deliverability Allocation (combined topics)

- a. Allocation Ranking Groups (one through seven)
- b. Specific Topics:
 - i. Overall TPD Allocation Process
 - ii. Elimination of Balance sheet financing terminology
 - iii. Elimination of Annual Full Capacity Deliverability Option
 - iv. Energy only projects' ability to re-enter the CAISO Queue for Full Capacity
 - v. Commercial Viability Criteria (PPA Clarification)

4.4 Change in Deliverability Status to Energy Only

4.6 Options to “Transfer” Deliverability

5. Energy Storage

5.2 Replacing Entire Existing Generator Facilities with Storage

6. Generator Interconnection Agreements

6.1 Suspension Notice

6.2 Affected Participating Transmission Owner

SDG&E support CAISO's position to continue with the separate UFA/GIA structure. Meaning to use separate agreements rather than combined four (or more) party agreement.

6.4 Ride-through Requirements for Inverter based Generation

SDG&E would like to highlight that the written proposal doesn't specify the duration required for a generation facility to inject reactive current into the grid. This may be inconsistent with NERC inverter-based resource performance task force (IRPTC) guidelines.

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

SDG&E reiterate its concern that the execution of a GIA does not guarantee that a project will progress towards completion in a timely manner. Therefore, a trigger for the removal of potential network upgrades should not be the execution of the GIA, but rather some other trigger point, such as receipt of final financial postings and written authorization to proceed from the Interconnection Customer.

7.3 Eliminate Conditions for Partial IFS Recovery Upon Withdrawal

7.5 Shared SANU and SANU Posting Criteria Issues

SDG&E supports CAISO position that all projects associated with a SANU should have 100% of the costs included in the maximum cost responsibility, in the same manner as contingent network upgrades are proposed. We also agree with the majority of stakeholders that SANU can be shared by more than one IC, and that a PTO should be allowed to make this determination on a case by case basis. We also agree with SCE that the current policy, where each project assigned a SANU posts for 100% of the associated costs should remain intact.

7.7 Reliability Network Upgrade Reimbursement Cap

SDG&E supports the CAISO's proposal that if a project withdraws after executing a GIA whose RNU costs exceed the \$60k/MW cap, the cost responsibility for the amount exceeding the \$60k/MW cap will fall to the later cluster projects needing the RNUs, in the fashion of a potential NU, but not be reimbursable. These costs will thus be included as contingent upgrades in the interconnection customers' study reports.

From the three options listed below, SDG&E supports option 1.

- Option 1 – have 100% of any precursor RNU's cost included in project's Maximum Cost Responsibility
- Option 2 – add the cost of any precursor RNU funded by a PTO to project's RNU costs to calculate the maximum RNU reimbursement
- Option 3 – allocate precursor RNU costs to MCR at time the project with GIA withdraws

8. Interconnection Request

8.4 Project Name Publication

9. Modifications

10. Additional Comments