

Stakeholder Comments Template

Subject: Generation Interconnection Procedures Phase 2 (“GIP 2”)

Submitted by	Company	Date Submitted
<i>Craig Cameron</i> Supervisor, Grid Planning 916.732.5363	SMUD	5/6/11

This template was created to help stakeholders structure their written comments on topics detailed in the April 14, 2011 *Straw Proposal for Generation Interconnection Procedures 2 (GIP 2) Proposal* (at <http://www.caiso.com/2b21/2b21a4fe115e0.html>). We ask that you please submit your comments in MS Word to GIP2@caiso.com no later than the close of business on May 5, 2011.

Your comments on any these issues are welcome and will assist the ISO in the development of the draft final proposal. Your comments will be most useful if you provide the reasons and the business case for your preferred approaches to these topics.

Your input will be particularly valuable to the extent you can provide greater definition and clarity to each of the proposals as well as concerns you may have with implementation or effectiveness.

Comments on topics listed in GIP 2 Straw Proposal:**Work Group 2**

8. Information provided by the ISO (Internet Postings)

Comments:

The Sacramento Municipal Utility District (SMUD) provides the following comments to the California Independent System Operator Corporation's (ISO) Generation Interconnection Procedures 2 Proposal.

SMUD believes that coordination with Affected Systems, as currently implemented and expressed in the ISO Tariff, is inadequate for Affected Systems to accurately determine the impacts of proposed interconnection projects on the Affected Systems and needs improvement. First, the ISO should ensure that the interconnection process complies with Western Electricity Coordinating Council and North American Electric Reliability Corporation reliability standards. This coordination should ensure that technical information from Affected Systems is incorporated into the ISO study processes. Second, the ISO should utilize and include other studies, including studies performed by Affected Systems. Absent this coordination, the interconnecting customer will not be fully aware of the scope and costs to mitigate any adverse impacts to the Affected System.

SMUD also requests that the ISO provide the technical study reports underlying the its generator interconnection studies (including Phase 1 and Phase 2) when requested by adjacent Transmission Planners through the secure website. Access to these reports will ensure that a determination by the ISO of Affected Systems can be evaluated by neighboring Transmission Planners with local system expertise. This can only be done if the potentially Affected Systems are afforded the full opportunity to review the interconnection plans and study reports.