

Energy Storage Interconnection

Draft Final Proposal

Submitted by	Company	Date Submitted
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SunEdison appreciates this opportunity to provide comments on the CAISO's Energy Storage Interconnection Draft Final Proposal. It goes without saying that preferred resources, such as energy storage, will be vital to the growth of the energy industry, especially with the continued expansion of distributed resources. As more demand side resources come onto the grid, utilities and independent developers will have to find ways to continue to not only be viable but also thrive. That is why SunEdison is particularly interested in this stakeholder initiative, as we continue to evolve right alongside our industry.

In regard to the Draft Final Proposal, SunEdison is concerned that the bifurcated process involved in the case where an Interconnection Customer wishes to charge at any time will cause unnecessary complexity to the interconnection process. That is to say, requiring interconnection under the GIDAP in addition to seeking firm load service from the applicable PTO could cause confusion and delays in the process. SunEdison advocates for, at a minimum, having an avenue in the tariff that streamlines the process with the PTO, rather than doing a simple handoff.

SunEdison is also concerned that studying storage alongside conventional resources will prove problematic. That being said, we greatly look forward to the results of the Cluster 7 studies due out on December 17.

Generally speaking, as an active participant in the region, SunEdison looks forward to working with the CAISO in the future to better refine this process, and we are committed to finding a solution to these and any other issues, both known and not, as they arise.