

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Barnaby Olson bolson@ablegridenergy.com (949) 432-0916	Able Grid	6/10/2018

Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Straw Proposal posted on May 9, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due June 4, 2018 by 5:00pm

The straw proposal posted on May 9, 2018 and the presentation discussed during the May 21, 2017 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 Transmission Plan Deliverability Allocation

4.2 Balance Sheet Financing

- 4.3 Participating in the Annual Full Capacity Deliverability Option
- 4.4 Change in Deliverability Status to Energy Only
- 4.5 Energy Only Projects' Ability to Re-enter the CAISO Queue for Full Capacity
- 4.6 Options to Transfer Deliverability

5. Energy Storage

- 5.2 Replacing Entire Existing Generator Facilities with Storage

Able Grid would like to raise the concern that some of the proposed procedures for converting an existing generating facility to energy storage would allow converted projects to leapfrog other energy storage projects in the interconnection queue. This potentially compromises the equitable nature of the interconnection study process by giving incumbent generators a competitive advantage over new generators. Able Grid would like to propose that the operating range of a project be used as a simple metric to determine whether or not a repowered project is consistent with the original interconnection application. For example, if a 100 MW generator was originally studied as having an operating range from 0 MW to 100 MW, adding storage without re-entering the interconnection queue would be permissible as long the project is not charging from the grid and stays within the 0 MW to 100 MW operating range. By contrast, replacing the generator with a 100 MW energy storage facility that charges from the grid and operates in the range of -100 MW to 100 MW would be a material change that requires resubmission into the interconnection queue. We believe that this simple framework is consistent with past precedent under which an expansion of the operating capabilities of a project is a material change to the interconnection requiring a new interconnection application, and that it maintains the competitive nature of the interconnection study process while providing a clear framework for market participants.

6. Generator Interconnection Agreements

- 6.1 Suspension Notice

6.2 Affected Participating Transmission Owner

6.3 Clarify New Resource Interconnection Requirements

6.4 Ride-through Requirements for Inverter based Generation

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

7.5 Shared SANU and SANU Posting Criteria Issues

7.6 Clarification on Posting Requirements for PTOs – **Final Proposal**

7.7 Reliability Network Upgrade Reimbursement Cap

7.9 Impact of Modifications on Initial Financial Security Posting

8. Interconnection Request

8.1 Study Agreement – **Final Proposal**

8.4 Project Name Publication

9. Modifications

9.1 Timing of Technology Changes

9.2 Commercial Viability – PPA Path Clarification

9.3 PPA Transparency – **Final Proposal**

9.4 Increase Repowering and Serial Re-Study Deposit– **Final Proposal**

9.5 Clarify Measure for Modifications After COD – **Final Proposal**

9.6 Short Circuit Duty Contribution Criteria for Repower Projects

10. Additional Comments