

Intersect Power is submitting the following comment to the 2018 Interconnection Process Enhancements Draft Tariff Language posted on September 4, 2018:

Section 8.9.2.1(2)(c.) Deliverability Affidavits as proposed states:

"The Interconnection Customer is on an active short list or other commercially recognized method of preferential ranking of power providers by a prospective purchaser Load Serving Entity, or is currently negotiating a power purchase agreement."

Intersect Power requests either the removal of the reference to "Load Serving Entity" or the addition of the clause, "or procuring entity", immediately following the term Load Serving Entity. This request is made to ensure eligibility for meeting the shortlist criteria is not limited to shortlists with LSEs, but also includes shortlists with other procuring entities that require Deliverability above zero. Other criteria in **Section 8.9.2.1(2)(c.)** do not specify an LSE as the off-taker, nor does the proposed language at the end of Section [8.9.2.1](#), so Intersect Power's requested revision seems to simply clarify the CAISO's original intent. These comments are also in-line with comments submitted by Intersect Power, and further discussed with the CAISO, to the Revised Straw Proposal - 2018 IPE posted on July 10, 2018.