

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Brian Theaker 530-295-3305 brian.theaker@nrg.com	NRG Energy, Inc.	February 8, 2018

Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Issues Paper posted on January 17, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due February 7, 2018 by 5:00pm

The issue paper posted on January 17, 2018 and the presentation discussed during the January 24, 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.

Initial comments

NRG supports and appreciates the comments provided by the Large-scale Solar Association (LSA). NRG also provides these separate comments, which focus exclusively on issues of particular importance to NRG.

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. NRG strongly supports including this issue in the IPE 2018 process. NRG has had no success with regards to acquiring deliverability for energy-only projects through the CAISO's existing procedures (Section 9.2 of Appendix DD of the CAISO Tariff, the CAISO's GIDAP procedures). NRG therefore supports providing an opportunity for EO projects to re-enter the CAISO's interconnection queue as a path towards acquiring deliverability.

4.6 Options to Transfer Deliverability

NRG strongly supports the inclusion of this issue in the IPE 2018 scope.

4.7 Transparency on Availability of Deliverability

4.8 Commercial Viability Criteria – Continuous Compliance Obligation

4.9 Interim Deliverability Status

4.10 Effective Load Carrying Capacity

4.11 Cancellation or Delay of CAISO Approved Transmission Projects

5. Energy Storage

5.1 Distributed Energy Resources

5.2 Replacing Entire Existing Generator Facilities with Storage NRG supports including this issue in the IPE 2018 process. While NRG appreciates the CAISO's position on this issue, and acknowledges that the dual nature of energy storage as both load and generating resource introduces complexities with regards to analyzing energy storage projects, the opportunity to leverage the existing infrastructure associated with the looming retirement of thousands of MW of conventional generation to develop energy storage resources should not be missed. Consequently, NRG encourages the CAISO to consider developing expedited interconnection processes that leverage this valuable existing infrastructure to promote the deployment of energy storage resources that are a key part of California's energy future.

5.3 Deliverability Assessment for Energy Storage Facilities

6. Generator Interconnection Agreements

6.1 Suspension Notice The implications of the CAISO having approval authority over a LGIA suspension period are very significant and warrant considerable discussion if the CAISO decides to move forward with this issue in IPE 2018.

6.2 Affected Participating Transmission Owner NRG supports the CAISO including this issue in IPE 2018.

6.3 Clarify New Resource Interconnection Requirements

6.4 Ride-through Requirements for Inverter based Generation While NRG does not oppose the CAISO exploring this topic in IPE 2018, NRG is concerned about the possibility of imposing new ride-through requirements on existing facilities in a manner that would be unduly expensive or burdensome.

6.5 Affected System Options

6.6 Modeling Data Requirements

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

7.2 ITCC for Non-cash Reimbursement Network Upgrade Costs

7.3 Financial Security Postings and Non-Refundable Amounts

- 7.4 Queue Clearing Measures
- 7.5 Shared SANU and SANU Posting Criteria Issues
- 7.6 Clarification on Posting Requirements for PTOs
- 7.7 Reliability Network Upgrade Reimbursement Cap
- 7.8 Reimbursement for Network Upgrades

8. Interconnection Request

- 8.1 Study Agreement
- 8.2 Revisions to Queue Entry Requirements
- 8.3 Master Planned Projects (Open Ended and Serial Projects)
- 8.4 Project Name Publication
- 8.5 Interconnection Request Application Enhancements
- 8.6 FERC Order No. 877

9. Modifications

- 9.1 Timing of Technology Changes
- 9.2 Commercial Viability – PPA Path Clarification

9.3 PPA Transparency

9.4 Increase Repowering and Serial Re-Study Deposit

9.5 Clarify Measure for Modifications After COD

9.6 Short Circuit Duty Contribution Criteria for Repower Projects

9.7 Material Modification for Parked Projects

10. Additional Comments