

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Draft Final Proposal paper posted on September 4, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due September 24, 2018 by 5:00pm

The Draft Final Proposal posted on September 4, 2018 and the presentation to be discussed during the September 17, 2018 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 Draft Final Proposal topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Draft Final Proposal paper for convenience.

6. Generator Interconnection Agreements

6.2 Affected Participating Transmission Owner

No comment.

6.4 Ride-through Requirements for Inverter based Generation

No comment.

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

No comment.

7.7 Reliability Network Upgrade Reimbursement Cap

SCE agrees with the CAISO that the \$60,000 per MW maximum reimbursement amount for funds advanced for RNUs has the potential to be circumvented in instances where earlier-queued projects withdraw from the queue but the upgrades are still needed by later-queued resources. SCE continues to believe that in such situations, the project(s) which still require, and ultimately benefit from, the RNUs should be required to pay the cost component in excess of the \$60,000/MW cap directly related to their project. The CAISO should not defer closing the existing loophole until it actually identifies such an outcome to the detriment of ratepayers. Rather, the CAISO should be proactive in addressing the identified risks and prevent ratepayers from being saddled with extra costs responsibility due to potential “gaming” by interconnection customers. As an interim measure, SCE recommends that if a withdrawing generator is truly independent, without any financial ties or interests to the later-queued generator which still needs the network upgrade, then there should be no concern with the possibility of “gaming”. If, however, the withdrawing/withdrawn interconnection customer and the later-queued generator still needing the network upgrade are not financially independent and, in fact, are affiliated, then the later-queued generator should assume the costs responsibility above the \$60,000/MW cap.

10. Additional Comments