

## 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 Revised Straw Proposal posted on July 10, 2018.

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due July 31, 2018 by 5:00pm**

The straw proposal posted on July 10, 2018 and the presentation discussed during the July 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 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, 4.2, 4.3, 4.5 and 9.2 Transmission Plan Deliverability Allocation (combined topics)

- a. Allocation Ranking Groups (one through seven)
- b. Specific Topics:
  - i. Overall TPD Allocation Process
  - ii. Elimination of Balance sheet financing terminology
  - iii. Elimination of Annual Full Capacity Deliverability Option
  - iv. Energy only projects' ability to re-enter the CAISO Queue for Full Capacity
  - v. Commercial Viability Criteria (PPA Clarification)

The Six Cities support the CAISO's proposal for this series of topics. Specifically, the Six Cities support the CAISO's proposal to include in deliverability allocation group #1 projects by interconnection customers that are load-serving entities with regulatory authority to authorize project development to serve their own loads.

### 4.4 Change in Deliverability Status to Energy Only

The Six Cities continue to support the CAISO's proposal for this topic in order to address concerns by the CAISO related to the conversion of projects to energy only status as a means of reducing the project's costs prior to withdrawal from the queue.

### 4.6 Options to "Transfer" Deliverability

The Six Cities do not have comments on this section of the Revised Straw Proposal at this time, which the Six Cities understand is unchanged from the prior proposal.

## 5. Energy Storage

### 5.2 Replacing Entire Existing Generator Facilities with Storage

The Six Cities do not have comments on this section of the Revised Straw Proposal at this time, which the Six Cities understand is unchanged from the prior proposal.

## 6. Generator Interconnection Agreements

### 6.1 Suspension Notice

The Six Cities do not have comments on this section of the Revised Straw Proposal.

### 6.2 Affected Participating Transmission Owner

The Six Cities do not have comments on this section of the Revised Straw Proposal.

#### 6.4 Ride-through Requirements for Inverter based Generation

The Six Cities do not have comments on this section of the Revised Straw Proposal.

### 7. Interconnection Financial Security and Cost Responsibility

#### 7.1 Maximum Cost Responsibility for NUs and Potential NUs

The Six Cities understand that the CAISO intends to further refine this topic within the Revised Straw Proposal in its next paper issued in this initiative. (See Revised Straw Proposal at 40.)

Preliminarily, the Six Cities offer limited comments on this aspect of the proposal:

- The description of how contingent network upgrades fit within the maximum cost exposure is unclear. Item 3 on page 41 states that the full cost of contingent facilities are included in the maximum cost exposure. Item 4a then states that the maximum cost responsibility can “never be more” than the lower of Phase I or II network upgrades, “plus the full cost of former contingent upgrade now assigned to this project.” This statement is unclear given that the full cost of contingent upgrades are already included in the maximum cost responsibility.
- The CAISO goes on to explain in item 4a that “More specifically, if a contingent upgrade becomes a direct upgrade, the full cost for that Network Upgrade will be included in the project’s maximum cost responsibility and the maximum cost responsibility may increase.” Again, this statement does not seem to make sense given that the CAISO states in item #3 that contingent network upgrades are already included in the maximum cost exposure at their full cost.

While the Six Cities support inclusion of the full cost of contingent network upgrades in a project’s maximum cost exposure, stakeholders may benefit from further explanation from the CAISO as to how to how the maximum cost responsibility can change over time and when contingent network upgrades either increase or decrease the maximum cost responsibility.

#### 7.3 Eliminate Conditions for Partial IFS Recovery Upon Withdrawal

The Six Cities support the CAISO’s proposal to exclude from this initiative consideration of SCE’s proposal relating to cost recovery for cancelled projects.

#### 7.5 Shared SANU and SANU Posting Criteria Issues

The Six Cities do not have comments on this Section of the Revised Straw Proposal.

#### 7.7 Reliability Network Upgrade Reimbursement Cap

The Six Cities continue to support the CAISO’s proposal on this topic. Further, the Six Cities support Option #1 to resolve concerns about the point at which precursor network upgrades are disclosed to interconnection customers and included in the maximum cost responsibility. It provides information to eligible customers regarding potential cost exposure for network

upgrades at the earliest possible stage, which appears to ensure that interconnection customers may proceed with development activities having a more complete understanding of their potential cost exposure.

Additionally, it may be useful to consider this issue in conjunction with issue 7.1.

## **8. Interconnection Request**

### 8.4 Project Name Publication

The Six Cities do not have comments on this Section of the Revised Straw Proposal.

## **9. Modifications**

### 9.1 Timing of Technology Changes

The Six Cities do not have comments on this Section of the Revised Straw Proposal.

## **10. Additional Comments**

As stated in their prior comments in this initiative, the Six Cities continue to be concerned regarding the justification for and scope of the revisions to the generator modeling data submittal requirements proposed by the CAISO through its Business Practice Manual change management process. The Six Cities refer the CAISO to their supplemental comments on the Straw Proposal, submitted on June 25, 2018, for an overview of their concerns, which the Six Cities continue to pursue through the Business Practice Manual development process.