

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Interconnection Process Enhancements Draft Final Proposal for Topics 1 and 2 posted on September 12 and as supplemented by the presentations and discussion during the September 19 stakeholder web conference, and subsequent amendments.

Submit comments to GIP@caiso.com

[Comments are due Thursday, October 3, 2013 by 5:00pm \(extended to Oct 7\)](#)**

Stakeholders are asked to base their comments on all of the following documents:

1. The Draft Final Proposal posted on September 12 which may be found at:

http://www.caiso.com/Documents/DraftFinalProposal_Topics_1-2_InterconnectionProcessEnhancements.pdf

2. The presentation discussed during the September 19 stakeholder web conference which may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancements-DraftFinalProposal_Topics1-2.pdf

3. Supplemental presentation slides amending the September 12 draft final proposal's approach to downsizing study costs and discussed during the September 19 stakeholder web conference which may be found at:

http://www.caiso.com/Documents/SupplementalPresentation-InterconnectionProcessEnhancements-DraftFinalProposal_Topics1-2.pdf

4. An amendment to the September 12 draft final proposal's approach to downsizing study costs to be posted on September 23 to the web page for this initiative at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>

Based on all the documents referenced above, please provide your comments on each of the topics listed below.

Topic 1 – Future downsizing policy

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 1:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

CPUC Staff support the proposal but request that the CAISO consider whether a situation described below is sufficiently important to require limits on how long/how much security deposit refunds can be delayed.

The CAISO’s latest proposal regarding future downsizing opportunities, posted September 24, provides that any refunding (true-up) of a portion of security deposits due to results of GIDAP reassessments (i.e., due to reduced overall identified interconnection costs) should only occur at the time of the next scheduled security deposit posting for the ICs in question, and not earlier. CPUC Staff understand the consistency and efficiency rationale for this revision to the proposal but question whether there should be some upper bound on the resulting delay of refunds. For example, if the next posting is driven by transmission completion more than X years away and the refund in question exceeds \$Y per MW, perhaps an expedited refund is warranted.

Topic 2 – Disconnection of completed phase(s) of project due to failure to complete subsequent phase

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 2:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

CPUC Staff fully support the CAISO's latest proposal but request a clarification. Responding to a major concern of generation developers, the CAISO's September 12 proposal states that "*The ISO will not seek to terminate the GIA solely [emphasis added] due to the interconnection customer's failure to complete the full MW required under the GIA*". It appears that if, besides not achieving the full MW, the project in question also does not meet one of three conditions listed on page 34 of the September 12 proposal¹ and furthermore does not participate in the new annual downsizing opportunity - - then, under such circumstances, the project may in fact be subject to GIA termination, depending on outcomes of a cure period, dispute resolution, negotiation and/or FERC determination, which outcomes are not necessarily predictable. We request confirmation that this is what is intended.

¹ These conditions involve failure to secure required permits or governmental approvals, or receiving a written statement indicating that such failure is likely at the full MW size, or failure to obtain legal right to use sufficient site acreage to support the full MW size.