

December 3, 2014

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: California Independent System Operator Corporation
Docket No. ER14-2586-____
Compliance Filing**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) submits this filing to comply with the Commission’s order issued on November 3, 2014 in the above-referenced proceeding.¹ In that order, the Commission accepted in part and rejected in part tariff revisions proposed by the CAISO to improve the efficiency and flexibility of the fast track and independent study portions of its interconnection processes, as well as to comply with the Commission’s Order No. 792.²

I. Background

The CAISO filed tariff revisions in this proceeding to improve two of its interconnection processes: (1) the independent study process, which allows generators that can demonstrate that they are independent of other projects in the queue to be studied serially outside the cluster studies; and (2) the fast track interconnection process, which allows qualifying small generators to interconnect through a significantly streamlined set of procedures. As part of this filing, the

¹ *California Independent System Operator Corp.*, 149 FERC ¶ 61,100 (2014) (“*November 3 Order*”). The CAISO submits this filing pursuant to section 205 of the Federal Power Act (“FPA”), 16 U.S.C. § 824d. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO tariff, and references to specific sections, articles, and appendices are references to sections, articles, and appendices in the current CAISO tariff as revised or proposed in this filing, unless otherwise indicated.

² *Small Generator Interconnection Agreements and Procedures*, Order No. 792, 145 FERC ¶ 61,159 (2013) (“*Order No. 792*”), *order clarifying compliance procedures*, Order No. 792-A, 146 FERC ¶ 61,214 (2014).

CAISO also proposed tariff revisions to satisfy the requirements of the Commission's Order No. 792. These tariff revisions, including revisions to the CAISO's fast track interconnection process, principally involved changes to the CAISO's Generator Interconnection and Deliverability Allocation Procedures ("GIDAP"). In its *November 3 Order*, the Commission issued an order largely accepting the proposed changes to the CAISO's independent study process. The Commission conditionally accepted some of the CAISO's proposed changes to comply with Order No. 792, but rejected other changes related to the proposed fast track interconnection process, including the CAISO's proposed fast track review, customer options meeting, and supplemental review.

II. Compliance Directives

In its *November 3 Order*, the Commission required the CAISO to submit another compliance filing within 30 days, or by December 3, 2014, consistent with the following directives:

- Revise the GIDAP pre-application report provisions applicable to small generators to clarify that information on available capacity at the proposed point of interconnection will be included in the pre-application report, if it is readily available.³
- Either adequately support the proposed combined initial and supplemental review process in the fast track interconnection process, or submit revisions to its GIDAP with separate review processes consistent with Order No. 792.⁴
- Address various elements related to fast track review, customer options meeting and supplemental review, including:
 - Explain the CAISO's proposal not to adopt the minimum load screen included in Order No. 792.⁵
 - Explain why the CAISO proposed more conservative reliability margins in sections 5.3.1.5 and 5.3.1.6 of the GIDAP or revise the screens to be consistent with Order No. 792;⁶

³ *November 3 Order* at P 16.

⁴ *Id.* at P 38.

⁵ *Id.* at P 40.

⁶ *Id.* at P 41.

- Explain why the CAISO proposed to make changes to the existing CAISO screen that limits aggregate generation to 10 MW on circuits with known transient stability limitations more restrictive by also proposing to consider voltage, thermal, and other known reliability limitations to the evaluation or remove this proposed limitation.⁷
- Explain why the CAISO proposed to require a \$25,000 study deposit to cover processing costs as well as the costs of increased study work CAISO proposes as part of the revised initial fast track process or to submit revisions to its GIDAP requiring the deposit to be in an amount equal to a good faith estimate of the cost of conducting the review.⁸
- Explain why the CAISO proposed revisions in section 5.4.1 of the GIDAP requiring the interconnection customer to submit a new interconnection request for processing under either a queue cluster or the independent study process after it has failed the screens in GIDAP section 5.3 or submit revisions consistent with the Commission's *pro forma* Small Generator Interconnection Procedures ("SGIP").⁹
- Revise section 5.4 of the GIDAP to provide the interconnection customer with a non-binding good faith estimate of the cost of a supplemental review at the customer options meeting consistent with Order No. 792.¹⁰
- Revise GIDAP section 4.4.4 to require written comments to be included in the system impact and facilities study report for the independent study process, consistent with the requirements of Order No. 792.¹¹
- Revise the GIDAP independent study process to state that upon request by the interconnection customer, the CAISO will provide supporting documentation, workpapers, and databases or data developed in the preparation of the Interconnection Facilities Study.¹²

⁷ *Id.* at P 42.

⁸ *Id.* at P 43.

⁹ *Id.* at P 44.

¹⁰ *Id.* at P 45.

¹¹ *Id.* at P 53.

¹² *Id.* at P 54.

In response to these directives, the CAISO has made numerous changes to its GIDAP, including restructuring its fast track interconnection process to include a set of an initial screens and a supplemental review process that is substantially similar to the process set forth in Order No. 792. The CAISO believes its proposed tariff provisions are just and reasonable because (i) they are consistent with or superior to the Commission's *pro forma* interconnection provisions and satisfy the Commission's independent entity variation standard for deviations from the Commission's *pro forma* provisions and (ii) comply with the Commission's *November 3 Order*. The CAISO provides a detailed description of these changes in section III and explains why the Commission should accept its proposed tariff revisions on compliance.¹³

In addition, in Attachment A to this filing, the CAISO compares the *pro forma* language in the Small Generator Interconnection Procedures, as revised by Order No. 792, with the CAISO's proposed language for the initial review, customer options meeting, and supplemental review processes under the fast track procedures. Attachment A identifies where variances between the two exist and discusses the reasons for these variances.

III. Proposed Tariff Revisions

The CAISO proposes to comply with the directives in the Commission's *November 3 Order*, through the tariff revisions discussed below. All of these tariff revisions are being made to the GIDAP (Appendix DD to the CAISO tariff) because all new requests by interconnection customers to take part in the independent study process and the fast track process under the CAISO tariff are now made pursuant to the GIDAP.

¹³ Order No. 792 at P 274. The Commission has previously applied the independent entity variation standard to the CAISO in its order approving the CAISO's generator interconnection procedures, which included revisions to the fast track process that diverged from the fast track process set forth in the Commission's *pro forma* Small Generator Interconnection Procedures. The Commission explained that, under the independent entity variation standard, the "CAISO is not required to demonstrate, and we are not required to find, that the proposal at hand is the only or even the best approach." See *California Independent System Operator Corp.*, 133 FERC ¶ 61,223, at PP 71, 73 (2010) (explaining that the independent entity variation standard "allows more flexibility than is otherwise provided under the 'consistent with or superior to' standard that applies to non-independent entities").

A. The CAISO proposes to amend its pre-application report process to state that the CAISO will include information on available capacity at the proposed point of interconnection in any pre-application report.

In its *November 3 Order*, the Commission stated that “section 1.2.3.4 of the SGIP requires the transmission provider to include in the pre-application report information on available capacity at the proposed point of interconnection.”¹⁴ The Commission explained that it was not clear that CAISO’s proposed pre-application report provisions included this information and, therefore, the Commission directed CAISO to revise its GIDAP pre-application report provisions to include this information in the pre-application report if it is readily available. The CAISO proposes to add a subsection (section 1.3.2.5) to its pre-application report process to explicitly state that the pre-application report will include “available capacity on a substation or circuit likely to serve the proposed point of interconnection.”

B. The CAISO has restructured its fast track interconnection process to reflect an initial review, customer options meeting and supplemental review.

The CAISO has restructured its fast track interconnection process to reflect the structure adopted by Order No. 792. Specifically, this structure includes a set of initial screens, and the ability for customers that do not pass the initial screens to elect to participate in a customer option meeting and a supplemental review process. Consistent with the directives of Order No. 792, the CAISO has modified language it initially proposed and offered an additional explanation to justify why its proposed language departs from the *pro forma* language adopted in Order No. 792. Of importance, the CAISO fast track interconnection process applies to *all* facilities under its operational control. On the other hand, the fast track interconnection reforms the Commission adopted in Order No. 792 only apply to facilities at or below 69kV. Thus, the CAISO is essentially making the benefits of the fast track interconnection reforms available to a broader set of resources – *i.e.*, all resources that are 5 MW or smaller. Because of this, some variances from the *pro forma* language in Order No. 792 are appropriate and necessary.

¹⁴ *November 3 Order* at P 16.

i. The CAISO's proposed initial review screens for fast track interconnections are consistent with or superior to those adopted by Order No. 792 and meet the independent entity variation standard.

As part of its *November 3 Order*, the Commission rejected the CAISO's proposed fast track interconnection screens. The Commission determined that the CAISO's proposal to consolidate initial and supplemental review screens into one process was more restrictive than the reforms adopted in Order No. 792. The Commission also determined that the CAISO had not justified other changes to its existing tariff. In this compliance filing, the CAISO proposes to restructure its fast track interconnection process to include the separate initial and supplemental review processes adopted by the Commission in Order No. 792. The CAISO has also eliminated its proposed \$25,000 study deposit fee and reinstated the non-refundable processing fee of \$500 to undertake the initial review.¹⁵

The CAISO proposes language specifying that the applicable participating transmission owner will complete the initial review within 30 calendar days after the CAISO notifies the interconnection customer that its interconnection request is complete. This time frame, which adds only eight calendar days to the 15 business day period set forth in Order No. 792, meets the independent entity variation standard because under its Commission-approved interconnection framework, the participating transmission owner, rather than the CAISO, performs the initial review screens. In many cases, the initial review may require the participating transmission owner to perform a site survey to confirm whether or not it needs to construct facilities on its own system to accommodate the interconnection request. The CAISO must then coordinate the results of the screens with the participating transmission owner before notifying the customer, thus adding another step to the process. In addition, the CAISO is proposing to apply these procedures to interconnections at all voltage levels and not just at 69kV or below. This expands the number of potential requests the CAISO may receive.

For purposes of the initial review, the CAISO proposes the following:

- Retain an existing screen that allows fast track interconnections only to the CAISO grid.¹⁶ This provision makes clear that the CAISO's fast track process only applies to interconnections on facilities that are under CAISO operational control. This provision is substantively identical to the Commission's *pro forma* version of this screen.

¹⁵ GIDAP section 5.1(ii).

¹⁶ *Id.* at section 5.2.1.1.

- Eliminate the existing screen in section 5.3.1.3 (renumbered in this compliance filing as section 5.2.1.3), which corresponds to section 2.2.1.3 of the Commission's *pro forma* Small Generator Interconnection Procedures, involving the interconnection of a proposed generating facility to the load side of spot network protectors. This screen is not applicable to interconnections to the transmission facilities under the CAISO's control. A spot network protector is a type of protection scheme used on a distribution system, for example, in modern commercial buildings for the purpose of providing high reliability service to a single retail customer. The purpose of this scheme is to protect the utility system against reverse power flow from the load to the utility's sub-transmission system. Because spot network protection schemes are generally located at distribution voltage levels, the CAISO does not use this screen for interconnections to the CAISO controlled grid. Therefore, removing it from the CAISO's tariff is consistent with the independent entity variation standard.
- Retain the screen in section 5.3.1.2 (renumbered in this compliance filing as section 5.2.1.2) that assesses whether the aggregated generation on the circuit, including the proposed generating facility, exceeds 15 percent of the line section annual peak load. In its *November 3 Order*, the Commission questioned why the CAISO was maintaining this screen but not incorporating the minimum load screen adopted by the Commission in Order No. 792 as part of the supplemental review.¹⁷ The Commission expressed concerns that this screen alone may not account for the daytime-only impact of solar photovoltaic generation on a circuit.¹⁸ As part of this compliance filing, the CAISO proposes to incorporate the Commission's *pro forma* minimum load screen as part of a separate supplemental review. This approach addresses the Commission's concerns regarding the application of just the aggregate generation screen. Therefore, the CAISO's proposal to retain this screen, which is substantially identical to the Commission's *pro forma* screen, is just and reasonable.¹⁹
- With respect to the screen assessing the generating facility's contribution to a circuit's maximum fault current, the CAISO proposes to reinstate the maximum threshold to 10 percent (instead of 5 percent) consistent with the directives of the *November 3 Order*.²⁰

¹⁷ *November 3 Order* at PP 39-40.

¹⁸ *Id.*

¹⁹ See section 2.2.1.2 of the *pro forma* Small Generator Interconnection Procedures, available on the Commission's website at <http://www.ferc.gov/industries/electric/indus-act/gi/small-gen/SGIP-redline.pdf>.

²⁰ GIDAP section 5.2.1.4. See *November 3 Order* at P 41.

- With respect to the screen to assess whether the generating facility may exceed a specific percentage of the short circuit interrupting capability of transmission protective devices and equipment, the CAISO proposes to reinstate the threshold to 87.5 percent (instead of 80 percent) consistent with the directives of the *November 3 Order*.²¹
- To not include in its tariff the screens contained in sections 2.2.1.6 through 2.2.1.8 of the Commission's *pro forma* Small Generator Interconnection Procedures. These screens relate to interconnections to lower, distribution-voltage facilities, and are therefore not applicable to generators seeking to interconnect to the transmission grid under the CAISO's operational control. The Commission previously approved the CAISO's removal of these screens from the GIDAP.²²
- Include an initial review screen that assesses if a generating facility seeks to interconnect in an area where there are known transient stability, voltage, or thermal limitations as identified in the CAISO's most recently completed queue cluster studies or transmission planning process.²³ Even if a generating facility does not pass this screen, it may still proceed to the supplemental review process. In its *November 3 Order*, the Commission directed the CAISO to explain why adding voltage and thermal limitations to this initial review screen is just and reasonable. These limitations are appropriate to consider because the addition of a generator in an area where the CAISO has recently identified thermal or voltage limitations could potentially exacerbate these conditions, and either drive the need for a new upgrade or require the review and possible modification of an upgrade already identified in existing studies. Regardless, given potential reliability and operational problems, it is appropriate under such circumstances that the CAISO evaluate the impact of interconnecting additional capacity on these pre-existing conditions through the supplemental review process.
- Include an initial review screen that assesses whether or not the interconnection will require construction of facilities by a participating transmission owner on its own system.²⁴ This screen mirrors the *pro forma*

²¹ GIDAP section 5.2.1.5. *November 3 Order* at P 41.

²² See *California Independent System Operator Corp.*, 133 FERC ¶ 61,223, at PP 36-37, 114-15.

²³ GIDAP section 5.2.1.6.

²⁴ *Id.* at section 5.2.1.7.

language in the Commission's Small Generator Interconnection Procedures.²⁵

As explained above, the initial review proposed by the CAISO will apply to all voltages on the CAISO grid, not only facilities rated at 69kV or below. In addition, the CAISO proposes to apply fewer screens as part of its initial review than under the Commission's *pro forma* language from the Small Generator Interconnection Procedures. The CAISO's proposed initial review screens are therefore less restrictive than the Commission's *pro forma* language, and the Commission should find that this language is consistent with or superior to reforms adopted in Order No. 792.

Based on the outcome of the initial review screens, the CAISO proposes to incorporate the remaining provisions of the initial review that govern the next steps if an interconnection customer passes the screens or if an interconnection customer fails the screen, with one exception. Under the CAISO's proposed language, the CAISO would provide an interconnection customer that passes the initial review screens or fails the initial screens but can still interconnect safely and reliably with an interconnection agreement within 15 business days. The Commission previously approved this longer timeframe based on the fact that the CAISO and applicable participating transmission owner would need to coordinate in preparing interconnection agreements.²⁶ This will still be the case under the revised fast track process. Therefore, the Commission should allow the CAISO to retain the 15 business day timeframe for providing customers that pass the initial screens with an interconnection agreement.

ii. The CAISO's proposed customer options meeting for fast track interconnections is consistent with or superior to the process adopted in Order No. 792 and meets the independent entity variation standard.

As part of its *November 3 Order*, the Commission rejected the CAISO's proposed customer options meeting provisions when it rejected the CAISO's fast track interconnection screening process. The Commission also raised concerns that the CAISO proposal to require an interconnection customer to resubmit an interconnection request if it failed the initial review screens did not include a provision requiring the CAISO to provide the interconnection customer with a non-binding good faith estimate of the cost of a supplemental review.²⁷

²⁵ See section 2.2.1.10 of the *pro forma* Small Generator Interconnection Procedures.

²⁶ *California Independent System Operator Corp.*, 133 FERC ¶ 61,223, at P 40.

²⁷ *November 3 Order* at PP 44-45.

In this compliance filing, the CAISO proposes to restructure its fast track interconnection process consistent with the format contemplated in Order No. 792. The CAISO proposes to incorporate the *pro forma* language relating to the customer options meeting from Order No. 792, with minor, immaterial deviations detailed in Attachment A.²⁸

The CAISO has also included language to clarify that an interconnection customer will not need to resubmit an interconnection request if it fails the fast track interconnection screens and decides to continue to proceed under the independent study process or the queue cluster study process, so long as the customer provides the study deposit required by GIDAP section 3.5.²⁹ In addition, the CAISO has included language that it will provide the interconnection customer with a non-binding good faith estimate of the costs of a supplemental review. Accordingly, the CAISO's proposed language pertaining to the customer options meeting in the fast track interconnection process is now consistent with the directives of Order No. 792.

iii. The CAISO's proposed supplemental review process for fast track interconnections is consistent with or superior to the process adopted in Order No. 792 and meets the independent entity variation standard.

As part of its *November 3 Order*, the Commission rejected the CAISO's proposed supplemental review process which served as a means to assess what interconnection facilities a resource would need to safely interconnect under the fast track process. The CAISO's proposed process also would permit the CAISO to expedite system impact and facilities studies for eligible interconnection customers that failed the fast track interconnection process. The Commission also questioned why the CAISO proposed to eliminate the minimum load screen as part of the supplemental review.³⁰

In this compliance filing, the CAISO is proposing to reinstate the supplemental review process contemplated by Order No. 792. This process includes the minimum load screen, the safety and reliability screen, and the voltage and power quality screen. The CAISO proposes to incorporate the *pro forma* language adopted by Order No. 792 for the minimum load screen and safety and reliability screen as well as the procedural elements of conducting the supplemental review with only two substantive deviations.³¹

²⁸ See GIDAP section 5.4.

²⁹ Eligibility to participate in the independent study process will, as with other interconnection requests, be subject to the criteria set forth in GIDAP section 4.1.

³⁰ *November 3 Order* at P 39.

³¹ The CAISO is also proposing a number of minor, non-material modifications to these

First, the CAISO is proposing to add language to the main supplemental review provision (section 5.5.4) to specify that the interconnection customer, CAISO and applicable participating transmission owner may agree to extend the 30 business day timeframe for conducting a supplemental review. The purpose of this language is to address situations in which the CAISO and participating transmission owner believe that relatively minor modifications or additional upgrades would allow the interconnection customer to pass the supplemental review, but the participating transmission owner requires more than 30 business days to identify, design, and estimate the costs of the necessary modifications and/or additional facilities. This is more likely to occur under the CAISO's procedures as compared to the Commission's pro forma procedures because the CAISO permits larger facilities (up to 5 MW rather than 2 MW) to use the fast track process to interconnect to higher-voltage facilities (above 69kV). Therefore, it is reasonable to allow the CAISO and participating transmission owner the option, with the consent of the interconnection customer, to take more time if necessary to evaluate whether a generating facility might pass the supplemental review process, and thereby qualify for interconnection under fast track.

The CAISO also proposes to modify the voltage and power quality screen to read as follows:

In aggregate with existing generation on the line section, the proposed Generating Facility shall not cause the violation of voltage standards, as set forth in the CAISO's Planning Standards, on any part of the CAISO Controlled Grid.³²

Consistent with the independent entity variation standard, the CAISO is proposing to modify this screen so that it references the specific voltage standards that the CAISO applies when studying generators and operating its system, instead of the more generic IEEE standards. The CAISO's Planning Standards are available on the CAISO website and present objective criteria for assessing whether a proposed generating facility may create a violation of voltage standards.³³ The CAISO's voltage standards are contained in section II(3) of that document and specify voltage levels and allowable deviations under both normal and contingency conditions depending on the voltage of the transmission facility to which the generating facility interconnects. In this respect, the CAISO standards can be characterized as a "utility practice similar to IEEE Standard 1453." The CAISO submits, however, that it will be clearer to

provisions as detailed in Attachment A.

³² See revised GIDAP section 5.5.4.2.

³³ See <http://www.caiso.com/Documents/TransmissionPlanningStandards.pdf>.

customers to simply refer to the applicable voltage requirements that the CAISO applies.

iv. The CAISO has modified its independent study process consistent with the directives in the Commission's *November 3 Order*.

In its *November 3 Order*, the Commission directed the CAISO to include written comments of an interconnection customer in the study report prepared under the independent study process. The Commission determined that the GIDAP section 4.4.4 does not provide for inclusion of interconnection customer written comments in the study report under the independent study process and directed that the CAISO revise GIDAP section 4.4.4 to require that the CAISO include written comments in the system impact and facilities study report for the independent study process, consistent with the requirements of Order No. 792.³⁴ As part of this filing the CAISO proposes to include the following language at the end of section 4.4.4:

Should the Interconnection Customer provide written comments on the system impact and facilities study report within ten (10) Business Days of receipt of the report, but in no event less than three (3) Business Days before the Results Meeting conducted to discuss the report, whichever is sooner, the CAISO will address the written comments in the Results Meeting. Should the Interconnection Customer provide comments at any later time (up to the time of the Results Meeting), then such comments shall be considered informal inquiries to which the CAISO will provide informal, informational responses at the Results Meeting, to the extent possible. The Interconnection Customer may submit, in writing, additional comments on the final system impact and facilities study report up to three (3) Business Days following the Results Meeting.

Based on any discussion at the Results Meeting and any comments received, the CAISO (in consultation with the applicable Participating TO(s)) will determine whether it is necessary to follow the final system impact and facilities study report with a revised study report or an addendum. The CAISO will issue any such revised report or addendum to the Interconnection Customer no later than fifteen (15) Business Days following the Results Meeting.

³⁴ *November 3 Order* at PP 46-53, citing Order No. 792 at P 203.

This language is consistent with existing language in the CAISO's GIDAP that the *November 3 Order* recognizes is consistent with or superior to the language adopted in Order No. 792.³⁵

The Commission also directed the CAISO to include tariff provisions to provide interconnection customers with supporting documentation, workpapers, and databases or data developed in the preparation of the interconnection facilities study.³⁶ In compliance with this directive, the CAISO proposes to include the following tariff language to GIDAP section 4.4.4:

Upon request, the CAISO shall provide the Interconnection Customer all supporting documentation, workpapers and relevant pre-Interconnection Request and post-Interconnection Request power flow, short circuit and stability databases for the final system impact or facilities study, subject to confidentiality arrangements consistent with Section 15.1.

This language is similar to CAISO's GIDAP sections 6.6 and 8.5 for the Phase I and Phase II interconnection study processes, which the Commission's *November 3 Order* finds consistent with or superior to the Order No. 792 requirement to provide supporting documentation for the Phase I and Phase II interconnection study processes.³⁷

³⁵ *Id.* at P 53.

³⁶ *Id.* at P 54.

³⁷ *Id.*

IV. Communications

Correspondence and other communications regarding this filing should be directed to:

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V. Service

The CAISO has served copies of this filing on the California Public Utilities Commission, the California Energy Commission, all parties with scheduling coordinator agreements under the CAISO tariff, and all parties on the official service list for Docket No. ER14-2856-000. In addition, the CAISO has posted a copy of the filing on the CAISO website.

VI. Contents of Filing

In addition to this transmittal letter, this filing includes the following attachments:

Attachment A	Table comparing tariff revisions set forth in Order No. 792 and tariff revisions proposed in this filing
Attachment B	Clean CAISO tariff sheets incorporating this tariff amendment
Attachment C	Red-lined document showing the revisions contained in this tariff amendment

VII. Conclusion

For the reasons set forth in this filing, the CAISO respectfully requests that the Commission accept this filing as meeting the compliance directives of Order

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No. 792 and the *November 3 Order*, and issue an order that accepts the tariff revisions proposed in the filing effective as of 61 days after the date of this filing, *i.e.*, February 2, 2015.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom this 3rd day of December, 2014.

/s/ Sarah Garcia

Sarah Garcia

Attachment A – Comparison Table

Compliance Filing – Interconnection Process Enhancements, Topics 4 and 5

California Independent System Operator Corporation

ATTACHMENT A

**Table Comparing Pro Forma SGIP Provisions and
GIDAP Provisions as Revised by this Compliance Filing**

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
Initial Review (Section 2.2):	Initial Review (Section 5.2):	
<p>Within 15 Business Days after the Transmission Provider notifies the Interconnection Customer it has received a complete Interconnection Request, the Transmission Provider shall perform an initial review using the screens set forth below, shall notify the Interconnection Customer of the results, and include with the notification copies of the analysis and data underlying the Transmission Provider's determinations under the screens. (Section 2.2)</p>	<p>Within thirty (30)⁴⁵ Calendar^{Business} Days after the CAISO^{Transmission Provider} notifies the Interconnection Customer that they has received a complete Interconnection Request is deemed complete, valid, and ready to be studied, the applicable Participating TO^{Transmission Provider} shall perform an initial review using the screens set forth in Section 5.2.1 below, and shall notify the Interconnection Customer of the results in a report that provides the details of, and include with the notification copies of the analysis and data underlying the Participating TO's^{Transmission}</p>	<p>This compliance filing revises the existing GIDAP provision to:</p> <p>(1) change notification period from 15 business days to 30 calendar days because that additional amount of time is needed to allow the Participating TO to perform the initial review screens and for the CAISO to coordinate the results of the screens with the Participating TO before notifying the Interconnection Customer (see transmittal letter for this compliance filing at section III.B.i); and</p> <p>(2) clarify that the applicable Participating TO will provide the Interconnection Customer the results of the screens.</p> <p>Existing CAISO language:</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	<p>Provider's determinations under the screens. (Section 5.2)</p>	<p>(1) “deemed complete, valid and ready to be studied” tracks identical language from CAISO’s general interconnection request verification language;</p> <p>(2) refers to a “report” in lieu of “copies of the analysis” to track the terminology that the CAISO uses throughout its interconnection procedures to describe the manner in which it provides to customers the results of interconnection studies and analyses;</p> <p>(3) uses CAISO-specific term “Participating TO” rather than generic “Transmission Provider”.</p>
<p>Initial Review Screens (Section 2.2.1):</p>	<p>Initial Review Screens (Section 5.2.1):</p>	
<p>The proposed Small Generating Facility’s Point of Interconnection must be on a portion of the Transmission Provider’s Distribution System that is subject to the Tariff. (Section 2.2.1.1)</p>	<p>The proposed Small Generating Facility’s Point of Interconnection must be on <u>the CAISO Controlled Grid</u> portion of the Transmission Provider’s Distribution System that is subject to the Tariff. (Section 5.2.1.1)</p>	<p>This existing and unchanged GIDAP provision reflects the fact that the CAISO operates the CAISO controlled grid rather than a distribution system. (See transmittal letter for this compliance filing at section III.B.i.)</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>For interconnection of a proposed Small Generating Facility to a radial distribution circuit, the aggregated generation, including the proposed Small Generating Facility, on the circuit shall not exceed 15% of the line section annual peak load as most recently measured at the substation. A line section is that portion of a Transmission Provider’s electric system connected to a customer bounded by automatic sectionalizing devices or the end of the distribution line. (Section 2.2.1.2)</p>	<p>For interconnection of a proposed Small Generating Facility to a radial distribution<u>transmission</u> circuit <u>on the CAISO Controlled Grid</u>, the aggregated generation <u>on the circuit</u>, including the proposed Small Generating Facility, on the circuit shall not exceed 15% <u>percent</u> of the line section annual peak load as most recently measured at the substation. <u>For purposes of this Section 5.2.1.2, a</u> line section <u>shall be considered as</u> that portion of a <u>Participating TO’s</u>Transmission Provider’s electric system connected to a customer bounded by automatic sectionalizing devices or the end of the <u>transmission</u>distribution line.</p> <p><u>This screen will not be required for a proposed interconnection of a Generating Facility to a radial transmission circuit with no load.</u></p> <p><u>In cases where the circuit lacks the telemetry needed to provide the</u></p>	<p>This compliance filing revises the existing GIDAP provision to:</p> <p>(1) specify that interconnection of a proposed generating facility to a radial transmission circuit can only occur on the CAISO controlled grid (see transmittal letter for this compliance filing at section III.B.i);</p> <p>(2) specify that the screen does not apply to a proposed interconnection of a generating facility to a radial transmission circuit with no load (see id.); and</p> <p>(3) specify that in cases where the circuit lacks the needed telemetry, the CAISO will use power flow cases from the most recent information available to the CAISO, which best aligns with the CAISO’s assessment of reliability impacts, or lack thereof, which may occur as a result of the interconnection (see id.).</p> <p>Existing CAISO language:</p>

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	<p><u>annual peak load measurement data, the CAISO shall use power flow cases from the latest completed Queue Cluster studies (either Phase I or Phase II) to perform this screen.</u></p> <p>(Section 5.2.1.2)</p>	<p>(1) uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1);</p> <p>(2) uses CAISO-specific term “Participating TO” rather than generic “Transmission Provider”;</p> <p>(3) uses the term “transmission” instead of “distribution” to reflect the fact that the CAISO operates a high-voltage transmission system rather than a distribution system.</p>
<p>For interconnection of a proposed Small Generating Facility to the load side of spot network protectors, the proposed Small Generating Facility must utilize an inverter-based equipment package and, together with the aggregated other inverter-based generation, shall not exceed</p>	<p>[Not Used]For interconnection of a proposed Generating Facility to the load side of spot network protectors, the proposed Generating Facility must utilize an inverter-based equipment package and, together with the aggregated other inverter-based generation,</p>	<p>This compliance filing eliminates the screen under the GIDAP provision because it is more suitable for interconnection of distribution-level voltages that are much lower than the voltages of transmission facilities under the CAISO’s operational control. The CAISO proposes to add new GIDAP</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>the smaller of 5% of a spot network's maximum load or 50 kW [footnote omitted]. (Section 2.2.1.3)</p>	<p>shall not exceed the smaller of 5 percent of a spot network's maximum load or 50 kW. For purposes of this Section 5.3.1.3, a spot network shall be considered as a type of distribution system found in modern commercial buildings for the purpose of providing high reliability of service to a single retail customer. (Section 5.2.1.3)</p>	<p>section 5.5.4.2 to include a separate voltage and power quality screen in the supplemental review. (See transmittal letter for this compliance filing at section III.B.i.)</p>
<p>The proposed Small Generating Facility, in aggregation with other generation on the distribution circuit, shall not contribute more than 10% to the distribution circuit's maximum fault current at the point on the high voltage (primary) level nearest the proposed point of change of ownership. (Section 2.2.1.4)</p>	<p>The proposed Small Generating Facility, in aggregation with other generation <u>Generating Facilities</u> on the transmission <u>distribution</u> circuit, shall not contribute more than 10 percent to the transmission <u>distribution</u> circuit's maximum fault current at the point on the high voltage (primary) level nearest the proposed point of change of ownership.</p> <p><u>The CAISO shall use the short circuit study data from the latest completed Queue Cluster studies</u></p>	<p>This compliance filing revises the existing GIDAP provision to:</p> <p>(1) makes wording changes to replace “aggregation” with “aggregate” and “generation” with “Generating Facilities”; and</p> <p>(2) specifies that the CAISO will use the short circuit study data from the most recent information available to the CAISO, which best aligns with the CAISO’s assessment of reliability impacts, or lack thereof, which may occur as a result of the interconnection.</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	<p><u>(either Phase I or Phase II) to test this screen.</u> (Section 5.2.1.4)</p>	<p>Existing CAISO language:</p> <p>(1) uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1);</p> <p>(2) uses the term “transmission” instead of “distribution” to reflect the fact that the CAISO operates a high-voltage transmission system rather than a distribution system.</p>
<p>The proposed Small Generating Facility, in aggregate with other generation on the distribution circuit, shall not cause any distribution protective devices and equipment (including, but not limited to, substation breakers, fuse cutouts, and line reclosers), or Interconnection Customer equipment on the system</p>	<p>The proposed Small Generating Facility, in aggregate with other <u>Generating Facilities</u> generation on the transmission <u>distribution</u> circuit, shall not cause any transmission <u>distribution</u> protective devices and equipment (including, but not limited to, substation breakers, fuse cutouts, and line</p>	<p>This compliance filing revises the existing GIDAP provision to:</p> <p>(1) makes wording change to replace “generation” with “Generating Facilities”; and</p> <p>(2) specifies that the CAISO will use the short circuit study data from the most recent information available to the</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>to exceed 87.5% of the short circuit interrupting capability; nor shall the interconnection be proposed for a circuit that already exceeds 87.5% of the short circuit interrupting capability. (Section 2.2.1.5)</p>	<p>reclosers), or Interconnection Customer equipment on the system to exceed 87.5 <u>percent%</u> of the short circuit interrupting capability; nor shall the interconnection be proposed for a circuit that already exceeds 87.5 <u>percent%</u> of the short circuit interrupting capability.</p> <p><u>The CAISO shall use the short circuit study data from the most recently completed Queue Cluster studies (either Phase I or Phase II) to test this screen.</u></p> <p>(Section 5.2.1.5)</p>	<p>CAISO, which best aligns with the CAISO’s assessment of reliability impacts, or lack thereof, which may occur as a result of the interconnection.</p> <p>Existing CAISO language:</p> <p>(1) uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1);</p> <p>(2) uses the term “transmission” instead of “distribution” to reflect the fact that the CAISO operates a high-voltage transmission system rather than a distribution system;</p> <p>(3) uses the word “percent” instead of the % symbol consistent with the other provisions in the CAISO’s interconnection procedures.</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>Using the table below, determine the type of interconnection to a primary distribution line. This screen includes a review of the type of electrical service provided to the Interconnection Customer, including line configuration and the transformer connection to limit the potential for creating over-voltages on the Transmission Provider's electric power system due to a loss of ground during the operating time of an anti-islanding function. [Table not reproduced here.] (Section 2.2.1.6)</p>	N/A	<p>The existing GIDAP omits this pro forma SGIP provision because the CAISO operates the CAISO controlled grid rather than a distribution system that may include a primary distribution line. (See transmittal letter for this compliance filing at section III.B.i, which cites California Independent System Operator Corp., 133 FERC ¶ 61,223, at PP 36-37, 114-15 (2010).)</p>
<p>If the proposed Small Generating Facility is to be interconnected on single-phase shared secondary, the aggregate generation capacity on the shared secondary, including the proposed Small Generating Facility, shall not exceed 20 kW. (Section 2.2.1.7)</p>	N/A	<p>The existing GIDAP omits this pro forma SGIP provision because the CAISO operates the CAISO controlled grid rather than a distribution system that may include a single-phase shared secondary. (See transmittal letter for this compliance filing at section III.B.i, which cites California Independent System Operator Corp., 133 FERC ¶ 61,223, at PP 36-37, 114-15 (2010).)</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>If the proposed Small Generating Facility is single-phase and is to be interconnected on a center tap neutral of a 240 volt service, its addition shall not create an imbalance between the two sides of the 240 volt service of more than 20% of the nameplate rating of the service transformer. (Section 2.2.1.8)</p>	<p>N/A</p>	<p>The existing GIDAP omits this pro forma SGIP provision because the CAISO operates the CAISO controlled grid rather than a distribution system that may include an interconnection on a center tap neutral of a 240-volt service. (See transmittal letter for this compliance filing at section III.B.i, which cites California Independent System Operator Corp., 133 FERC ¶ 61,223, at PP 36-37, 114-15 (2010).)</p>
<p>The Small Generating Facility, in aggregate with other generation interconnected to the transmission side of a substation transformer feeding the circuit where the Small Generating Facility proposes to interconnect shall not exceed 10 MW in an area where there are known, or posted, transient stability limitations to generating units located in the general electrical vicinity (e.g., three or four transmission busses from the point of interconnection). (Section 2.2.1.9)</p>	<p><u>A Generating Facility will fail this initial review, but will be eligible for a supplemental review, if it proposes to interconnect in an area where there are known transient stability, voltage, or thermal limitations identified in the most recently completed Queue Cluster studies or transmission planning process.</u>The Generating Facility, in aggregate with other generation interconnected to the transmission side of a substation transformer feeding the circuit</p>	<p>This revised GIDAP provision permits a generating facility to be eligible to proceed to the supplemental review process even if the CAISO's queue cluster study or transmission plan identifies known limitations in an area where the generating facility seeks to interconnect. (See transmittal letter for this compliance filing at section III.B.i.)</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	<p>where the Generating Facility proposes to interconnect shall not exceed 10 MW in an area where there are known, or posted, transient stability limitations to generating units located in the general electrical vicinity (e.g., three or four transmission busses from the Point of Interconnection). (Section 5.2.1.6)</p>	
<p>No construction of facilities by the Transmission Provider on its own system shall be required to accommodate the Small Generating Facility. (Section 2.2.1.10)</p>	<p>No construction of facilities by <u>a Participating TO</u>the Transmission Provider on its own system shall be required to accommodate the <u>proposed Small</u> Generating Facility. (Section 5.2.1.7)</p>	<p>This new GIDAP provision is the same as the pro forma SGIP provision, except:</p> <p>(1) replaces the generic term “Transmission Provider” with the CAISO tariff-specific term “Participating TO”; and</p> <p>(2) makes wording change to replace “Small Generating Facility” with “proposed Generating Facility” consistent with other provisions in the GIDAP.</p>
<p>If the proposed interconnection passes the screens, the Interconnection Request shall be</p>	<p>If the proposed interconnection passes the screens, the Interconnection Request shall be</p>	<p>As revised in this compliance filing, the GIDAP provision is the same as the pro forma SGIP provision except for pre-</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>approved and the Transmission Provider will provide the Interconnection Customer an executable interconnection agreement within five Business Days after the determination. (Section 2.2.2)</p>	<p>approved. <u>Within fifteen (15) Business Days thereafter, and the Participating TO Transmission Provider</u> will provide the Interconnection Customer <u>with an executable Small Generator Interconnection Agreement for execution within five Business Days after the determination.</u> (Section 5.2.2)</p>	<p>existing GIDAP language:</p> <p>(1) the CAISO proposes to retain the 15-business-day period for providing an interconnection agreement in order to ensure sufficient time for the CAISO to coordinate with the applicable Participating TO (see transmittal letter for this compliance filing at section III.B.i);</p> <p>(2) replaces the generic term “Transmission Provider” with the CAISO tariff-specific term “Participating TO”; and</p> <p>(3) specifies that the Participating TO will provide a customer with a Small Generator Interconnection Agreement, to distinguish it from the CAISO’s Large Generator Interconnection Agreement.</p>
<p>If the proposed interconnection fails the screens, but the Transmission Provider determines that the Small Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards, the Transmission Provider</p>	<p>If the proposed interconnection fails the screens, but the <u>CAISO and Participating TO Transmission Provider</u> determines that the <u>Small</u> Generating Facility may nevertheless be interconnected consistent with safety, reliability,</p>	<p>As revised in this compliance filing, the GIDAP provision is the same as the pro forma SGIP provision except for pre-existing GIDAP language:</p> <p>(1) The CAISO proposes to retain the 15-business-day period for providing an</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>shall provide the Interconnection Customer an executable interconnection agreement within five Business Days after the determination. (Section 2.2.3)</p>	<p>and power quality standards <u>under these procedures</u>, the <u>Participating TO</u>Transmission Provider shall, <u>within fifteen (15) Business Days</u>, provide the Interconnection Customer <u>with an executable Small Generator</u> Interconnection Agreement for execution within five Business Days after the determination. (Section 5.2.3)</p>	<p>interconnection agreement in order to ensure sufficient time for the CAISO to coordinate with the applicable Participating TO (see transmittal letter for this compliance filing at section III.B.i); and</p> <p>(2) replaces the generic term “Transmission Provider” with specific references to the “CAISO” and “Participating TO”.</p>
<p>If the proposed interconnection fails the screens, and the Transmission Provider does not or cannot determine from the initial review that the Small Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards unless the Interconnection Customer is willing to consider minor modifications or further study, the Transmission Provider shall provide the Interconnection Customer with the opportunity to attend a customer options meeting. (Section 2.2.4)</p>	<p>If the proposed interconnection fails the screens, and the <u>CAISO and Participating TO</u>Transmission Provider does not or cannot determine from the initial review that the Small Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards unless the Interconnection Customer is willing to consider minor modifications or further study, the <u>Participating TO</u>Transmission Provider shall provide the Interconnection</p>	<p>This compliance filing revises the existing GIDAP provision to make it the same as the pro forma SGIP provision, except:</p> <p>(1) makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider’s responsibility under the pro forma SGIP provision, consistent with existing GIDAP provisions, using CAISO-specific terminology; and</p> <p>(2) adds CAISO tariff-specific cross-reference to GIDAP provision.</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	Customer with the opportunity to attend a customer options meeting <u>as described in Section 5.4.</u> (Section 5.2.4)	
Customer Options Meeting (Section 2.3):	Customer Options Meeting (Section 5.4):	
<p>If the Transmission Provider determines the Interconnection Request cannot be approved without (1) minor modifications at minimal cost, (2) a supplemental study or other additional studies or actions, or (3) incurring significant cost to address safety, reliability, or power quality problems, the Transmission Provider shall notify the Interconnection Customer of that determination within five Business Days after the determination and provide copies of all data and analyses underlying its conclusion. Within ten Business Days of the Transmission Provider's determination, the Transmission Provider shall offer to convene a</p>	<p>If the <u>CAISO and Participating TO</u>Transmission Provider determines the Interconnection Request cannot be approved without (1) minor modifications at minimal cost; (2) a supplemental study or other additional studies or actions; or (3) incurring significant cost to address safety, reliability, or power quality problems, the <u>CAISO and Participating TO</u>Transmission Provider shall notify the Interconnection Customer of that determination within five <u>(5)</u> Business Days of after that the determination and provide copies of all data and analyses underlying <u>their</u>its conclusion. Within ten <u>(10)</u></p>	<p>This compliance filing revises the existing GIDAP provision to make it the same as the pro forma SGIP provision, except:</p> <p>(1) makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider's responsibility under the pro forma SGIP provision, consistent with existing GIDAP provisions, using CAISO-specific terminology;</p> <p>(2) uses the term "Generating Facility" rather than "Small Generating Facility" because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>customer options meeting with the Transmission Provider to review possible Interconnection Customer facility modifications or the screen analysis and related results, to determine what further steps are needed to permit the Small Generating Facility to be connected safely and reliably. At the time of notification of the Transmission Provider's determination, or at the customer options meeting, the Transmission Provider shall:</p> <p>(Section 2.3)</p>	<p>Business Days of the <u>CAISO and Participating TO's</u>Transmission Provider's determination, the <u>CAISO and Participating TO</u>Transmission Provider shall offer to convene a customer options meeting with the <u>CAISO and Participating TO</u>Transmission Provider to review possible Interconnection Customer facility modifications or the screen analysis and related results, to determine what further steps are needed to permit the Small Generating Facility to be connected safely and reliably. At the time of notification of the <u>CAISO and Participating TO's</u>Transmission Provider's determination, or at the customer options meeting, the <u>CAISO and Participating TO</u>Transmission Provider shall:</p> <p>(Section 5.4)</p>	<p>not more than 5 MW (see existing GIDAP Section 5.1); and</p> <p>(3) makes minor punctuation and wording changes.</p>
<p>Offer to perform facility modifications</p>	<p>Offer to perform facility</p>	<p>This compliance filing revises the</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>or minor modifications to the Transmission Provider's electric system (e.g., changing meters, fuses, relay settings) and provide a non-binding good faith estimate of the limited cost to make such modifications to the Transmission Provider's electric system. If the Interconnection Customer agrees to pay for the modifications to the Transmission Provider's electric system, the Transmission Provider will provide the Interconnection Customer with an executable interconnection agreement within ten Business Days of the customer options meeting; or (Section 2.3.1)</p>	<p>modifications or minor modifications to the <u>Participating TO's Transmission Provider's</u> electric system (e.g., changing meters, fuses, relay settings) and provide a non-binding good faith estimate of the limited cost to make such modifications to the <u>Participating TO's Transmission Provider's</u> electric system. If the Interconnection Customer agrees to pay for the modifications to the <u>Participating TO's Transmission Provider's</u> electric system, the <u>Participating TO Transmission Provider</u> will provide the Interconnection Customer with an executable interconnection agreement within ten <u>(10)</u> Business Days of the customer options meeting; or (Section 5.4.1)</p>	<p>existing GIDAP provision to make it the same as the pro forma SGIP provision, except:</p> <p>(1) replaces the generic terms "Transmission Provider" and "Transmission Provider's" with the CAISO tariff-specific terms "Participating TO" and "Participating TO's"; and</p> <p>(2) makes minor wording changes.</p>
<p>Offer to perform a supplemental review in accordance with section 2.4 and provide a non-binding good faith</p>	<p>Offer to perform a supplemental review in accordance with sSection <u>5.52.4</u> and provide a non-binding</p>	<p>This compliance filing revises the existing GIDAP provision to make it the same as the pro forma SGIP provision,</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
estimate of the costs of such review; or (Section 2.3.2)	good faith estimate of the costs of such review; or (Section 5.4.2)	except replaces cross-reference to pro forma SGIP provision with cross-reference to GIDAP provision.
Obtain the Interconnection Customer's agreement to continue evaluating the Interconnection Request under the section 3 Study Process. (Section 2.3.3)	<u>Offer to include the Interconnection Request in either the next Queue Cluster Window or the Independent Study Process, subject to the eligibility criteria set forth in Section 4.1, and the provision of the study deposit set forth in Section 3.5. Within fifteen (15) Business Days of the customer options meeting the Interconnection Customer shall provide the CAISO, in writing, with its election on how to proceed with its Interconnection Request. If the Interconnection Customer does not make an election within this time period, the CAISO will deem the Interconnection Request withdrawn.</u> Obtain the Interconnection Customer's agreement to continue evaluating the Interconnection Request under	This compliance filing revises the GIDAP provision to address concerns expressed in paragraph 44 of the Commission's order by allowing the Interconnection Customer to include its interconnection request in the next queue cluster or the independent study process without having to resubmit an interconnection request. (See transmittal letter for this compliance filing at section III.B.ii.)

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	the Independent Study Process or Cluster Study Process. (Section 5.4.3)	
Supplemental Review (Section 2.4):	Supplemental Review (Section 5.5):	
<p>To accept the offer of a supplemental review, the Interconnection Customer shall agree in writing and submit a deposit for the estimated costs of the supplemental review in the amount of the Transmission Provider’s good faith estimate of the costs of such review, both within 15 Business Days of the offer. If the written agreement and deposit have not been received by the Transmission Provider within that timeframe, the Interconnection Request shall continue to be evaluated under the section 3 Study Process unless it is withdrawn by the Interconnection Customer. (Section 2.4.1)</p>	<p>To accept the offer of a supplemental review, the Interconnection Customer shall agree in writing and submit a deposit for the estimated costs of the supplemental review in the amount of the Transmission Provider’s <u>good faith estimate determined by the CAISO and Participating TO of the costs of such review</u>, both within fifteen <u>(15)</u> Business Days of the offer, <u>or elect one of the options set forth in Section 5.4.3.</u> If the written agreement and deposit have not been received by the Transmission Provider within that timeframe, the Interconnection Request shall continue to be evaluated under the section 3 Study Process unless it</p>	<p>This compliance filing revises the GIDAP provision to make it the same as the pro forma SGIP provision, except:</p> <p>(1) makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider’s responsibility under the pro forma SGIP provision, consistent with existing GIDAP provisions, using CAISO-specific terminology; and</p> <p>(2) allows the Interconnection Customer to elect to include its interconnection request in the next queue cluster or the independent study process without having to resubmit an interconnection request (see revised GIDAP section 5.4.3), in lieu of continuing to be evaluated under the pro forma SGIP study process, because the CAISO tariff</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	<p>is withdrawn by the Interconnection Customer. (Section 5.5.1)</p>	<p>does not include a separate SGIP.</p>
<p>The Interconnection Customer may specify the order in which the Transmission Provider will complete the screens in section 2.4.4. (Section 2.4.2)</p>	<p>The Interconnection Customer may specify the order in which the <u>CAISO and Participating TO</u>Transmission Provider will complete the screens in sSection <u>5.5.42.4.4</u>. (Section 5.5.2)</p>	<p>This new GIDAP provision is the same as the pro forma SGIP provision, except:</p> <p>(1) makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider’s responsibility under the pro forma SGIP provision, consistent with existing GIDAP provisions, using CAISO-specific terminology; and</p> <p>(2) replaces cross-reference to pro forma SGIP provision with cross-reference to GIDAP provision.</p>
<p>The Interconnection Customer shall be responsible for the Transmission Provider’s actual costs for conducting the supplemental review. The Interconnection Customer must pay any review costs that exceed the deposit within 20 Business Days of receipt of the invoice or resolution of any dispute. If the deposit exceeds</p>	<p>The Interconnection Customer shall be responsible for the <u>CAISO and Participating TO’s</u>Transmission Provider’s actual costs for conducting the supplemental review. The Interconnection Customer must pay any review costs that exceed the deposit within <u>twenty (20)</u></p>	<p>This existing and unchanged GIDAP provision is the same as the pro forma SGIP provision except for CAISO-specific language (“CAISO” and “Participating TO” instead of “Transmission Provider”).</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>the invoiced costs, the Transmission Provider will return such excess within 20 Business Days of the invoice without interest. (Section 2.4.3)</p>	<p>Business Days of receipt of the invoice or resolution of any dispute. If the deposit exceeds the invoiced costs, the <u>CAISO and Participating TO Transmission Provider</u> will return such excess, <u>without interest</u>, within <u>twenty (20)</u> Business Days of the invoice <u>without interest</u>. (Section 5.5.3)</p>	
<p>Within 30 Business Days following receipt of the deposit for a supplemental review, the Transmission Provider shall (1) perform a supplemental review using the screens set forth below; (2) notify in writing the Interconnection Customer of the results; and (3) include with the notification copies of the analysis and data underlying the Transmission Provider's determinations under the screens. Unless the Interconnection Customer provided instructions for how to respond to the failure of any of the supplemental review screens below at the time the Interconnection</p>	<p>Within <u>thirty (30)</u> Business Days following receipt of the deposit for a supplemental review, <u>or some longer period agreed to by the Interconnection Customer, CAISO, and Participating TO Transmission Provider</u> shall (1) perform a supplemental review using the screens set forth below; (2) notify in writing the Interconnection Customer of the results; and (3) include with the notification copies of the analysis and data underlying the <u>CAISO and Participating TO's Transmission Provider's</u> determinations under the screens.</p>	<p>This compliance filing revises the existing GIDAP provision to make it the same as the pro forma SGIP provision, except:</p> <p>(1) gives the Interconnection Customer, CAISO, and Participating TO the additional flexibility to agree if necessary to a period longer than 30 business days for performance of the actions under the section (see transmittal letter for this compliance filing at section III.B.iii);</p> <p>(2) makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider's responsibility under the pro forma SGIP provision, consistent with existing GIDAP</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>Customer accepted the offer of supplemental review, the Transmission Provider shall notify the Interconnection Customer following the failure of any of the screens, or if it is unable to perform the screen in section 2.4.4.1, within two Business Days of making such determination to obtain the Interconnection Customer's permission to: (1) continue evaluating the proposed interconnection under this section 2.4.4; (2) terminate the supplemental review and continue evaluating the Small Generating Facility under section 3; or (3) terminate the supplemental review upon withdrawal of the Interconnection Request by the Interconnection Customer. (Section 2.4.4)</p>	<p>Unless the Interconnection Customer provided instructions for how to respond to the failure of any of the supplemental review screens below at the time the Interconnection Customer accepted the offer of supplemental review, the CAISO and Participating TO Transmission Provider shall notify the Interconnection Customer following the failure of any of the screens, or if they are it is unable to perform the screen in sSection 5.5.4.12-4.4.4, within two (2) Business Days of making such determination to obtain the Interconnection Customer's permission to: (1) continue evaluating the proposed interconnection under this sSection 5.5.42-4.4; (2) terminate the supplemental review and offer the Interconnection Customer the options set forth incontinue evaluating the Small Generating Facility under sSection 5.4.3; or (3)</p>	<p>provisions, using CAISO-specific language;</p> <p>(3) replaces cross-references to pro forma SGIP provisions with cross-references to GIDAP provisions;</p> <p>(4) allows the Interconnection Customer to elect to include its interconnection request in the next queue cluster or the independent study process without having to resubmit an interconnection request (see revised GIDAP section 5.4.3), in lieu of continuing to be evaluated under the pro forma SGIP study process, which does not exist under the CAISO tariff; and</p> <p>(5) clarifies that, in conducting the screens discussed above, the CAISO will use power flow or short circuit study data from the most recent information available to the CAISO, which best aligns with the CAISO's assessment of reliability impacts, or lack thereof, which may occur as a result of the interconnection.</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	<p>terminate the supplemental review upon withdrawal of the Interconnection Request by the Interconnection Customer. (Section 5.5.4)</p> <p><u>In conducting these screens, the CAISO and Participating TO will use power flow or short circuit study data from the most recently completed Queue Cluster studies (either Phase I or Phase II).</u></p>	
<p>Minimum Load Screen: Where 12 months of line section minimum load data (including onsite load but not station service load served by the proposed Small Generating Facility) are available, can be calculated, can be estimated from existing data, or determined from a power flow model, the aggregate Generating Facility capacity on the line section is less than 100% of the minimum load for all line sections bounded by automatic sectionalizing devices upstream of the proposed Small Generating</p>	<p>Minimum Load Screen: Where 12 months of line section minimum load data (including onsite load but not station service load served by the proposed Small Generating Facility) are available, can be calculated, can be estimated from existing data, or determined from a power flow model, the aggregate Generating Facility capacity on the line section is less than 100 percent% of the minimum load for all line sections bounded by automatic sectionalizing devices</p>	<p>This new GIDAP provision is the same as the pro forma SGIP provision, except:</p> <p>(1) uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1);</p> <p>(2) uses the word “percent” instead of the % symbol consistent with the other</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>Facility. If minimum load data is not available, or cannot be calculated, estimated or determined, the Transmission Provider shall include the reason(s) that it is unable to calculate, estimate or determine minimum load in its supplemental review results notification under section 2.4.4. (Section 2.4.4.1)</p>	<p>upstream of the proposed Small Generating Facility. If minimum load data is not available, or cannot be calculated, estimated or determined, the CAISO and Participating TO <u>Transmission Provider</u> shall include the reason(s) that they are <u>it is</u> unable to calculate, estimate or determine minimum load in their <u>its</u> supplemental review results notification under s <u>Section 5.5.4.2-4.4.</u> (Section 5.5.4.1)</p>	<p>provisions in the GIDAP; (3) makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider’s responsibility under the pro forma SGIP provision, consistent with existing GIDAP provisions, using CAISO-specific terminology; and (4) replaces cross-reference to pro forma SGIP provision with cross-reference to GIDAP provision.</p>
<p>The type of generation used by the proposed Small Generating Facility will be taken into account when calculating, estimating, or determining circuit or line section minimum load relevant for the application of screen 2.4.4.1. Solar photovoltaic (PV) generation systems with no battery storage use daytime minimum load (i.e. 10 a.m. to 4 p.m. for fixed panel systems and 8 a.m. to 6 p.m. for PV systems utilizing tracking systems), while all other generation uses</p>	<p>The type of generation used by the proposed Small Generating Facility will be taken into account when calculating, estimating, or determining circuit or line section minimum load relevant for the application of screen 5.5.4.12-4.4.1. Solar photovoltaic (PV) generation systems with no battery storage use daytime minimum load (i.e. 10 a.m. to 4 p.m. for fixed panel systems and 8 a.m. to 6 p.m. for PV systems</p>	<p>This new GIDAP provision is the same as the pro forma SGIP provision, except: (1) uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1); and (2) replaces cross-reference to pro forma</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
absolute minimum load. (Section 2.4.4.1.1)	utilizing tracking systems), while all other generation uses absolute minimum load. (Section 5.5.4.1.1)	SGIP provision with cross-reference to GIDAP provision.
When this screen is being applied to a Small Generating Facility that serves some station service load, only the net injection into the Transmission Provider’s electric system will be considered as part of the aggregate generation. (Section 2.4.4.1.2)	When this screen is being applied to a Small Generating Facility that serves some station service load, only the net injection into the Transmission Provider’s <u>Participating TO’s</u> electric system will be considered as part of the aggregate generation. (Section 5.5.4.1.2)	This new GIDAP provision is the same as the pro forma SGIP provision, except: (1) uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1); and (2) replaces the generic term “Transmission Provider’s” with the CAISO tariff-specific term “Participating TO’s”.
Transmission Provider will not consider as part of the aggregate generation for purposes of this screen generating facility capacity known to be already reflected in the minimum load data. (Section 2.4.4.1.3)	<u>The CAISO and Participating TO</u> Transmission Provider will not consider as part of the aggregate generation for purposes of this screen generating facility capacity known to be already reflected in	This new GIDAP provision is the same as the pro forma SGIP provision, except makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider’s responsibility under the pro forma SGIP provision,

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	the minimum load data. (Section 5.5.4.1.3)	consistent with existing GIDAP provisions, using CAISO-specific terminology
<p>Voltage and Power Quality Screen: In aggregate with existing generation on the line section: (1) the voltage regulation on the line section can be maintained in compliance with relevant requirements under all system conditions; (2) the voltage fluctuation is within acceptable limits as defined by Institute of Electrical and Electronics Engineers (IEEE) Standard 1453, or utility practice similar to IEEE Standard 1453; and (3) the harmonic levels meet IEEE Standard 519 limits. (Section 2.4.4.2)</p>	<p>Voltage and Power Quality Screen: In aggregate with existing generation on the line section, <u>the proposed Generating Facility shall not cause the violation of voltage standards, as set forth in the CAISO's Planning Standards, on any part of the CAISO Controlled Grid.</u> -(1) the voltage regulation on the line section can be maintained in compliance with relevant requirements under all system conditions; (2) the voltage fluctuation is within acceptable limits as defined by Institute of Electrical and Electronics Engineers (IEEE) Standard 1453, or utility practice similar to IEEE Standard 1453; and (3) the harmonic levels meet IEEE Standard 519 limits. (Section 5.5.4.2)</p>	<p>This new GIDAP provision is tailored to ensure that the generating facility does not cause the violation of voltage standards on any part of the CAISO controlled grid pursuant to the CAISO-specific Planning Standards rather than the more generic IEEE standards. The CAISO Planning Standards are available on the CAISO website and provide objective criteria for assessing whether a proposed generating facility may create a violation of voltage standards. (See transmittal letter for this compliance filing at section III.B.iii.)</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>Safety and Reliability Screen: The location of the proposed Small Generating Facility and the aggregate generation capacity on the line section do not create impacts to safety or reliability that cannot be adequately addressed without application of the Study Process. The Transmission Provider shall give due consideration to the following and other factors in determining potential impacts to safety and reliability in applying this screen. (Section 2.4.4.3)</p>	<p>Safety and Reliability Screen: The location of the proposed Small Generating Facility and the aggregate generation capacity on the line section do not create impacts to safety or reliability that cannot be adequately addressed without <u>studying the Generating Facility in either the Queue Cluster or application of the Independent Study Processes</u>. The <u>CAISO and Participating TO</u> Transmission Provider shall give due consideration to the following and other factors in determining potential impacts to safety and reliability in applying this screen. (Section 5.5.4.3)</p>	<p>This new GIDAP provision is the same as the pro forma SGIP provision, except:</p> <ul style="list-style-type: none"> (1) uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1); (2) replaces generic reference to “application of the Study Process” with CAISO tariff-specific reference to “studying the Generating Facility in either the Queue Cluster or Independent Study processes”; and (3) makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider’s responsibility under the pro forma SGIP provision, consistent with existing GIDAP provisions, using CAISO-specific terminology.

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
Whether the line section has significant minimum loading levels dominated by a small number of customers (e.g., several large commercial customers). (Section 2.4.4.3.1)	Whether the line section has significant minimum loading levels dominated by a small number of customers (e.g., several large commercial customers). (Section 5.5.4.3.1)	This new GIDAP provision is the same as the pro forma SGIP provision.
Whether the loading along the line section is uniform or even. (Section 2.4.4.3.2)	Whether the loading along the line section is uniform or even. (Section 5.5.4.3.2)	This new GIDAP provision is the same as the pro forma SGIP provision.
Whether the proposed Small Generating Facility is located in close proximity to the substation (i.e., less than 2.5 electrical circuit miles), and whether the line section from the substation to the Point of Interconnection is a Mainline rated for normal and emergency ampacity. (Section 2.4.4.3.3)	Whether the proposed Small Generating Facility is located in close proximity to the substation (i.e., less than 2.5 electrical circuit miles), and whether the line section from the substation to the Point of Interconnection is a Mainline rated for normal and emergency ampacity. <u>For purposes of this screen, a Mainline is the three-phase backbone of a circuit and will typically constitute lines with wire sizes of 4/0 American wire gauge, 336.4 kcmil, 397.5 kcmil, 477 kcmil and 795</u>	This new GIDAP provision is the same as the pro forma SGIP provision, except: (1) uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1); and (2) defines a Mainline for purposes of this screen using the definition set forth in pro forma SGIP Section 2.1.

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
	<u>kcmil.</u> (Section 5.5.4.3.3)	
Whether the proposed Small Generating Facility incorporates a time delay function to prevent reconnection of the generator to the system until system voltage and frequency are within normal limits for a prescribed time. (Section 2.4.4.3.4)	Whether the proposed Small Generating Facility incorporates a time delay function to prevent reconnection of the generator to the system until system voltage and frequency are within normal limits for a prescribed time. (Section 5.5.4.3.4)	This new GIDAP provision is the same as the pro forma SGIP provision, except uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1).
Whether operational flexibility is reduced by the proposed Small Generating Facility, such that transfer of the line section(s) of the Small Generating Facility to a neighboring distribution circuit/substation may trigger overloads or voltage issues. (Section 2.4.4.3.5)	Whether operational flexibility is reduced by the proposed Small Generating Facility, such that transfer of the line section(s) of the Small Generating Facility to a neighboring distribution circuit/substation may trigger overloads or voltage issues. (Section 5.5.4.3.5)	This new GIDAP provision is the same as the pro forma SGIP provision, except uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1).
Whether the proposed Small	Whether the proposed Small	This new GIDAP provision is the same

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>Generating Facility employs equipment or systems certified by a recognized standards organization to address technical issues such as, but not limited to, islanding, reverse power flow, or voltage quality. (Section 2.4.4.3.6)</p>	<p>Generating Facility employs equipment or systems certified by a recognized standards organization to address technical issues such as, but not limited to, islanding, reverse power flow, or voltage quality. (Section 5.5.4.3.6)</p>	<p>as the pro forma SGIP provision, except uses the term “Generating Facility” rather than “Small Generating Facility” because the fast track process under the GIDAP can apply to repowering or reconfiguration of an existing Generating Facility that results in an incremental increase in gross generating capacity by not more than 5 MW (see existing GIDAP Section 5.1).</p>
<p>If the proposed interconnection passes the supplemental screens in sections 2.4.4.1, 2.4.4.2, and 2.4.4.3 above, the Interconnection Request shall be approved and the Transmission Provider will provide the Interconnection Customer with an executable interconnection agreement within the timeframes established in sections 2.4.5.1 and 2.4.5.2 below. If the proposed interconnection fails any of the supplemental review screens and the Interconnection Customer does not withdraw its Interconnection Request, it shall continue to be evaluated</p>	<p>If the proposed interconnection passes the supplemental screens in Sections 5.5.4.1, 5.5.4.2, 2.4.4.1, 2.4.4.2, and 5.5.4.3 2.4.4.3 above, the Interconnection Request shall be approved and the <u>Participating TO</u> Transmission Provider will provide the Interconnection Customer with an executable interconnection agreement within the timeframes established in Sections 5.5.5.12-4.5.1 and 5.5.5.22-4.5.2 below. If the proposed interconnection fails any of the supplemental review</p>	<p>This new GIDAP provision is the same as the pro forma SGIP provision, except:</p> <ul style="list-style-type: none"> (1) replaces the generic term “Transmission Provider” with the CAISO tariff-specific term “Participating TO”; (2) replaces cross-references to pro forma SGIP provisions with cross-references to GIDAP provisions; and (3) allows the Interconnection Customer to elect to include its interconnection request in the next queue cluster or the independent study process without having to resubmit an interconnection request (see new GIDAP section 5.5.5.3, which cross-references revised GIDAP

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
under the section 3 Study Process consistent with section 2.4.5.3 below. (Section 2.4.5)	screens and the Interconnection Customer does not withdraw its Interconnection Request, it shall continue to be <u>treated in accordance evaluated under the section 3 Study Process consistent with sSection 5.5.5.32.4.5.3</u> below. (Section 5.5.5)	section 5.4.3), in lieu of continuing to be evaluated under the pro forma SGIP study process, which does not exist under the CAISO tariff.
If the proposed interconnection passes the supplemental screens in sections 2.4.4.1, 2.4.4.2, and 2.4.4.3 above and does not require construction of facilities by the Transmission Provider on its own system, the interconnection agreement shall be provided within ten Business Days after the notification of the supplemental review results. (Section 2.4.5.1)	If the proposed interconnection passes the supplemental screens in sSections 5.5.4.1, 5.5.4.2,2.4.4.1, 2.4.4.2, and 5.5.4.32.4.4.3 above and does not require construction of facilities by the Participating TOTransmission Provider on its own system, the interconnection agreement shall be provided within ten <u>(10)</u> Business Days after the notification of the supplemental review results. (Section 5.5.5.1)	This new GIDAP provision is the same as the pro forma SGIP provision, except: (1) replaces the generic term “Transmission Provider” with the CAISO tariff-specific term “Participating TO”; and (2) replaces cross-references to pro forma SGIP provisions with cross-references to GIDAP provisions.
If interconnection facilities or minor modifications to the Transmission Provider's system are required for the proposed interconnection to pass the	If interconnection facilities or minor modifications to the Participating TO'sTransmission Provider's system are required for the	This new GIDAP provision is the same as the pro forma SGIP provision, except: (1) replaces the generic term “Transmission Provider’s” with the

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>supplemental screens in sections 2.4.4.1, 2.4.4.2, and 2.4.4.3 above, and the Interconnection Customer agrees to pay for the modifications to the Transmission Provider’s electric system, the interconnection agreement, along with a non-binding good faith estimate for the interconnection facilities and/or minor modifications, shall be provided to the Interconnection Customer within 15 Business Days after receiving written notification of the supplemental review results. (Section 2.4.5.2)</p>	<p>proposed interconnection to pass the supplemental screens in sSections 5.5.4.1, 5.5.4.2, 2.4.4.1, 2.4.4.2, and 5.5.4.32.4.4.3 above, and the Interconnection Customer agrees to pay for the modifications to the <u>Participating TO’s</u>Transmission Provider’s electric system, the interconnection agreement, along with a non-binding good faith estimate for the interconnection facilities and/or minor modifications, shall be provided to the Interconnection Customer within <u>fifteen (15)</u> Business Days after receiving written notification of the supplemental review results. (Section 5.5.5.2)</p>	<p>CAISO tariff-specific term “Participating TO’s”; and (2) replaces cross-references to pro forma SGIP provisions with cross-references to GIDAP provisions.</p>
<p>If the proposed interconnection would require more than interconnection facilities or minor modifications to the Transmission Provider’s system to pass the supplemental screens in sections 2.4.4.1, 2.4.4.2, and 2.4.4.3 above, the Transmission Provider</p>	<p>If the proposed interconnection would require more than interconnection facilities or minor modifications to the <u>Participating TO’s</u>Transmission Provider’s system to pass the supplemental screens in sSections</p>	<p>This new GIDAP provision is the same as pro forma SGIP provision, except: (1) replaces the generic term “Transmission Provider’s” with the CAISO tariff-specific term “Participating TO’s”;</p>

Pro Forma SGIP Provision	GIDAP Provision	Basis for Any Variation in the GIDAP Provision from the Pro Forma SGIP Provision
<p>shall notify the Interconnection Customer, at the same time it notifies the Interconnection Customer with the supplemental review results, that the Interconnection Request shall be evaluated under the section 3 Study Process unless the Interconnection Customer withdraws its Small Generating Facility. (Section 2.4.5.3)</p>	<p><u>5.5.4.12.4.4.1, 5.5.4.22.4.4.2, and 5.5.4.32.4.4.3</u> above, the <u>CAISO and Participating TO</u> Transmission Provider shall notify the Interconnection Customer, at the same time theyit notifies the Interconnection Customer with the supplemental review results, <u>and offer the options set forth in Section 5.4.3 above. If the Interconnection Customer does not make an election within fifteen (15) Business Days, the CAISO will deem the Interconnection Request withdrawn.</u>that the Interconnection Request shall be evaluated under the section 3 Study Process unless the Interconnection Customer withdraws its Small Generating Facility. (Section 5.5.5.3)</p>	<p>(2) replaces cross-references to pro forma SGIP provisions with cross-references to GIDAP provisions;</p> <p>(3) makes the CAISO and Participating TO responsible for actions that are solely the Transmission Provider's responsibility under the pro forma SGIP provision, consistent with existing GIDAP provisions; and</p> <p>(4) allows the Interconnection Customer to elect to include its interconnection request in the next queue cluster or the independent study process without having to resubmit an interconnection request, in lieu of being evaluated under the pro forma SGIP study process, which does not exist under the CAISO tariff.</p>

Attachment B – Clean Tariff Records

Compliance Filing – Interconnection Process Enhancements, Topics 4 and 5

California Independent System Operator Corporation

1.3 Pre-Application

1.3.1 An Interconnection Customer with a proposed Small Generating Facility may submit a formal written request form along with a non-refundable fee of \$300 to the CAISO for a pre-application report on a proposed project at a specific site. The CAISO shall provide the pre-application data described in Section 1.3.2 to the Interconnection Customer within twenty (20) Business Days of receipt of the completed request form and payment of the \$300 fee. The CAISO shall coordinate with the Participating TO to complete the pre-application report. At the request of the CAISO, the Participating TO shall provide any readily available information necessary to complete the pre-application report. Readily available information shall mean information that the Participating TO currently has on hand. The Participating TO is not required to create new information but is required to compile, gather, and summarize information that it has on hand in a format that presents the information in a manner that informs the Interconnection Customer regarding issues related to its proposed Small Generating Facility. If providing any item in the pre-application report would require the Participating TO to perform a study or analysis beyond gathering and presenting existing information, then the information shall be deemed not readily available. The pre-application report produced by the CAISO is non-binding, does not confer any rights, and the Interconnection Customer must still successfully apply to interconnect to the CAISO's system. The written pre-application report request form shall include the information in Sections 1.3.1.1 through 1.3.1.8 below to clearly and sufficiently identify the location of the proposed Point of Interconnection that is under CAISO operational control.

1.3.1.1 Project contact information, including name, address, phone number, and email address.

1.3.1.2 Project location (street address with nearby cross streets and town).

1.3.1.3 Single proposed Point of Interconnection that is either an existing substation or a transmission line under CAISO operational control.

1.3.1.4 Generator Type (e.g., solar, wind, combined heat and power, etc.)

1.3.1.5 Size (alternating current kW/MW)

1.3.1.6 Single or three phase generator configuration

1.3.1.7 Stand-alone generator (no onsite load, not including station service – Yes or No?)

1.3.1.8 Is new service requested? Yes or No? If there is existing service, include the customer account number, site minimum and maximum current or proposed electric loads in kW/MW (if available) and specify if the load is expected to change.

1.3.2 Subject to Section 1.3.1, the pre-application report will include the following information:

1.3.2.1 Electrical configuration of the substation, including information of transmission lines terminating in the substation, transformers, buses and other devices, if the proposed Point of Interconnection is a substation.

- 1.3.2.2 Existing aggregate generation capacity (in MW) interconnected to a substation or circuit (i.e., amount of generation online) likely to serve the proposed Point of Interconnection.
- 1.3.2.3 Aggregate queued generation capacity (in MW) for a substation or circuit (i.e., amount of generation in the queue) likely to serve the proposed Point of Interconnection.
- 1.3.2.4 Based on the proposed Point of Interconnection, existing or known constraints such as, but not limited to, electrical dependencies at that location, short circuit issues, instability issues, facility loading issues, or voltage issues.
- 1.3.2.5 Available capacity on a substation or circuit likely to serve the proposed Point of Interconnection.

* * *

- 4.4.4 If requested by the Interconnection Customer, a Results Meeting shall be held among the CAISO, the applicable Participating TO(s), and the Interconnection Customer to discuss the results of the system impact and facilities study report, including assigned cost responsibility. The CAISO shall prepare minutes from the meeting. Any such Results Meeting will be held within twenty (20) Business Days of the date the system impact and facilities study report is provided to the Interconnection Customer.

Should the Interconnection Customer provide written comments on the system impact and facilities study report within ten (10) Business Days of receipt of the report, but in no event fewer than three (3) Business Days before the Results Meeting conducted to discuss the report, whichever is sooner, the CAISO will address the written comments in the Results Meeting. Should the Interconnection Customer provide comments at any later time (up to the time of the Results Meeting), then such comments shall be considered informal inquiries to which the CAISO will provide informal, informational responses at the Results Meeting, to the extent possible. The Interconnection Customer may submit, in writing, additional comments on the final system impact and facilities study report up to three (3) Business Days following the Results Meeting.

Based on any discussion at the Results Meeting and any comments received, the CAISO (in consultation with the applicable Participating TO(s)) will determine whether it is necessary to follow the final system impact and facilities study report with a revised study report or an addendum. The CAISO will issue any such revised report or addendum to the Interconnection Customer no later than fifteen (15) Business Days following the Results Meeting.

Upon request, the CAISO shall provide the Interconnection Customer all supporting documentation, workpapers, and relevant pre-Interconnection Request and post-Interconnection Request power flow, short circuit, and stability databases for the final system impact or facilities study, subject to confidentiality arrangements consistent with Section 15.1.

* * *

Section 5 Fast Track Process

5.1 Applicability and Initiation of Fast Track Process Request

Applicability to a proposed Generating Facility. An Interconnection Customer may request interconnection of a proposed Generating Facility to the CAISO Controlled Grid under the Fast Track Process if the Generating Facility is no larger than 5 MW and is requesting Energy-Only Deliverability Status and if the Interconnection Customer's proposed Generating Facility meets the codes, standards, and certification requirements of Appendices 9 and 10 of this GIDAP, or if the applicable Participating TO notifies the CAISO that it has reviewed the design for or tested the proposed Small Generating Facility and has determined that the proposed Generating Facility may interconnect consistent with Reliability Criteria and Good Utility Practice.

Applicability to an existing Generating Facility. If the Interconnection of an existing Generating Facility meets the qualifications for Interconnection under CAISO Tariff Section 25.1(d) or (e) but, at the same time, the Interconnection Customer also seeks to repower or reconfigure the existing Generating Facility in a manner that increases the gross generating capacity by not more than 5 MW, then the Interconnection Customer may request that the Fast Track Process be applied with respect to the repowering or reconfiguration of the existing Generating Facility that results in the incremental increase in MW.

Initiating the Fast Track Interconnection Request. To initiate an Interconnection Request under the Fast Track Process, and have the Interconnection Request considered for validation the Interconnection Customer must provide the CAISO with:

- (i) a completed Interconnection Request as set forth in Appendix 1;
- (ii) a non-refundable processing fee of \$500; and
- (iii) a demonstration of Site Exclusivity. For the Fast Track Process, such demonstration may include documentation reasonably demonstrating a right to locate the Generating Facility on real estate or real property improvements owned, leased, or otherwise legally held by another.

The CAISO shall review and validate the Fast Track Process Interconnection Request pursuant to Section 5.2.

In the event of a conflict between this Section 5 and another provision of this GIDAP, Section 5 shall govern.

5.2 Initial Review

Within thirty (30) Calendar Days after the CAISO notifies the Interconnection Customer that the Interconnection Request is deemed complete, valid, and ready to be studied, the applicable Participating TO shall perform an initial review using the screens set forth in Section 5.3 below, and shall notify the Interconnection Customer of the results in a report that provides the details of and data underlying the Participating TO's determinations under the screens.

5.2.1 Screens

5.2.1.1 The proposed Generating Facility's Point of Interconnection must be on the CAISO Controlled Grid. **5.2.1.2** For interconnection of a proposed Generating Facility to a radial transmission circuit on the CAISO Controlled Grid, the aggregated generation on the

circuit, including the proposed Generating Facility, shall not exceed 15 percent of the line section annual peak load as most recently measured at the substation. For purposes of this Section 5.2.1.2, a line section shall be considered as that portion of a Participating TO's electric system connected to a customer bounded by automatic sectionalizing devices or the end of the transmission line.

This screen will not be required for a proposed interconnection of a Generating Facility to a radial transmission circuit with no load.

In cases where the circuit lacks the telemetry needed to provide the annual peak load measurement data, the CAISO shall use power flow cases from the latest completed Queue Cluster studies (either Phase I or Phase II) to perform this screen.

5.2.1.3 [Not Used]

5.2.1.4 The proposed Generating Facility, in aggregate with other Generating Facilities on the transmission circuit, shall not contribute more than 10 percent to the transmission circuit's maximum fault current at the point on the high voltage (primary) level nearest the proposed point of change of ownership.

The CAISO shall use the short circuit study data from the latest completed Queue Cluster studies (either Phase I or Phase II) to test this screen.

5.2.1.5 The proposed Generating Facility, in aggregate with other Generating Facilities on the transmission circuit, shall not cause any transmission protective devices and equipment (including, but not limited to, substation breakers, fuse cutouts, and line reclosers), or Interconnection Customer equipment on the system to exceed 87.5 percent of the short circuit interrupting capability; nor shall the interconnection be proposed for a circuit that already exceeds 87.5 percent of the short circuit interrupting capability.

The CAISO shall use the short circuit study data from the most recently completed Queue Cluster studies (either Phase I or Phase II) to test this screen.

5.2.1.6 A Generating Facility will fail this initial review, but will be eligible for a supplemental review, if it proposes to interconnect in an area where there are known transient stability, voltage, or thermal limitations identified in the most recently completed Queue Cluster studies or transmission planning process.

5.2.1.7 No construction of facilities by a Participating TO on its own system shall be required to accommodate the proposed Generating Facility.

5.2.2 If the proposed interconnection passes the screens, the Interconnection Request shall be approved. Within fifteen (15) Business Days thereafter, the Participating TO will provide the Interconnection Customer with a Small Generator Interconnection Agreement for execution.

5.2.3 If the proposed interconnection fails the screens, but the CAISO and Participating TO determine that the Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards under these procedures, the Participating TO shall, within fifteen (15) Business Days, provide the Interconnection Customer with a Small Generator Interconnection Agreement for execution

5.2.4 If the proposed interconnection fails the screens and the CAISO and Participating TO do not or cannot determine from the initial review that the Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards unless the Interconnection Customer is willing to consider minor modifications or further study, the Participating TO shall provide the Interconnection Customer with the opportunity to attend a customer options meeting as described in Section 5.4.

5.3 [Not Used]

5.4 Customer Options Meeting

If the CAISO and Participating TO determine the Interconnection Request cannot be approved without (1) minor modifications at minimal cost; (2) a supplemental study or other additional studies or actions; or (3) incurring significant cost to address safety, reliability, or power quality problems, the CAISO and Participating TO shall notify the Interconnection Customer within five (5) Business Days of that determination and provide copies of all data and analyses underlying their conclusion. Within ten (10) Business Days of the CAISO and Participating TO's determination, the CAISO and Participating TO shall offer to convene a customer options meeting with the CAISO and Participating TO to review possible Interconnection Customer facility modifications or the screen analysis and related results, to determine what further steps are needed to permit the Generating Facility to be connected safely and reliably. At the time of notification of the CAISO and Participating TO's determination, or at the customer options meeting, the CAISO and Participating TO shall:

5.4.1 Offer to perform facility modifications or modifications to the Participating TO's electric system (e.g., changing meters, fuses, relay settings) and provide a non-binding good faith estimate of the limited cost to make such modifications to the Participating TO's electric system. If the Interconnection Customer agrees to pay for the modifications to the Participating TO's electric system, the Participating TO will provide the Interconnection Customer with an executable interconnection agreement within ten (10) Business Days of the customer options meeting; or

5.4.2 Offer to perform a supplemental review in accordance with Section 5.5 and provide a non-binding good faith estimate of the costs of such review; or

5.4.3 Offer to include the Interconnection Request in either the next Queue Cluster Window or the Independent Study Process, subject to the eligibility criteria set forth in Section 4.1, and the provision of the study deposit set forth in Section 3.5. Within fifteen (15) Business Days of the customer options meeting the Interconnection Customer shall provide the CAISO, in writing, with its election on how to proceed with its Interconnection Request. If the Interconnection Customer does not make an election within this time period, the CAISO will deem the Interconnection Request withdrawn.

5.5 Supplemental Review

5.5.1 To accept the offer of a supplemental review, the Interconnection Customer shall agree in writing and submit a deposit for the estimated costs of the supplemental review in the amount of the good faith estimate determined by the CAISO and Participating TO, both within fifteen (15) Business Days of the offer, or elect one of the options set forth in Section 5.4.3.

- 5.5.2** The Interconnection Customer may specify the order in which the CAISO and Participating TO will complete the screens in Section 5.5.4.
- 5.5.3** The Interconnection Customer shall be responsible for the CAISO and Participating TO's actual costs for conducting the supplemental review. The Interconnection Customer must pay any review costs that exceed the deposit within twenty (20) Business Days of receipt of the invoice or resolution of any dispute. If the deposit exceeds the invoiced costs, the CAISO and Participating TO will return such excess, without interest, within twenty (20) Business Days of the invoice.
- 5.5.4** Within thirty (30) Business Days following receipt of the deposit for a supplemental review, or some longer period agreed to by the Interconnection Customer, CAISO, and Participating TO, the CAISO and Participating TO shall (1) perform a supplemental review using the screens set forth below; (2) notify in writing the Interconnection Customer of the results; and (3) include with the notification copies of the analysis and data underlying the CAISO and Participating TO's determinations under the screens. Unless the Interconnection Customer provided instructions for how to respond to the failure of any of the supplemental review screens below at the time the Interconnection Customer accepted the offer of supplemental review, the CAISO and Participating TO shall notify the Interconnection Customer following the failure of any of the screens, or if they are unable to perform the screen in Section 5.5.4.1, within two (2) Business Days of making such determination to obtain the Interconnection Customer's permission to: (1) continue evaluating the proposed interconnection under this Section 5.5.4; (2) terminate the supplemental review and offer the Interconnection Customer the options set forth in Section 5.4.3; or (3) terminate the supplemental review upon withdrawal of the Interconnection Request by the Interconnection Customer.

In conducting these screens, the CAISO and Participating TO will use power flow or short circuit study data from the most recently completed Queue Cluster studies (either Phase I or Phase II).

5.5.4.1 Minimum Load Screen: Where 12 months of line section minimum load data (including onsite load but not station service load served by the proposed Generating Facility) are available, can be calculated, can be estimated from existing data, or determined from a power flow model, the aggregate Generating Facility capacity on the line section is less than 100 percent of the minimum load for all line sections bounded by automatic sectionalizing devices upstream of the proposed Generating Facility. If minimum load data is not available, or cannot be calculated, estimated or determined, the CAISO and Participating TO shall include the reason(s) that they are unable to calculate, estimate or determine minimum load in their supplemental review results notification under Section 5.5.4.

5.5.4.1.1 The type of generation used by the proposed Generating Facility will be taken into account when calculating, estimating, or determining circuit or line section minimum load relevant for the application of screen 5.5.4.1. Solar photovoltaic (PV) generation systems with no battery storage use daytime minimum load (i.e. 10 a.m. to 4 p.m. for fixed panel systems and 8 a.m. to 6 p.m. for PV systems utilizing tracking systems), while all other generation uses absolute minimum load.

interconnection agreement within the timeframes established in Sections 5.5.5.1 and 5.5.5.2 below. If the proposed interconnection fails any of the supplemental review screens and the Interconnection Customer does not withdraw its Interconnection Request, it shall be treated in accordance with Section 5.5.5.3 below.

5.5.5.1 If the proposed interconnection passes the supplemental screens in Sections 5.5.4.1, 5.5.4.2, and 5.5.4.3 above and does not require construction of facilities by the Participating TO on its own system, the interconnection agreement shall be provided within ten (10) Business Days after the notification of the supplemental review results.

5.5.5.2 If interconnection facilities or minor modifications to the Participating TO's system are required for the proposed interconnection to pass the supplemental screens in Sections 5.5.4.1, 5.5.4.2, and 5.5.4.3 above, and the Interconnection Customer agrees to pay for the modifications to the Participating TO's electric system, the interconnection agreement, along with a non-binding good faith estimate for the interconnection facilities and/or minor modifications, shall be provided to the Interconnection Customer within fifteen (15) Business Days after receiving written notification of the supplemental review results.

5.5.5.3 If the proposed interconnection would require more than interconnection facilities or minor modifications to the Participating TO's system to pass the supplemental screens in Sections 5.5.4.1, 5.5.4.2, and 5.5.4.3 above, the CAISO and Participating TO shall notify the Interconnection Customer, at the same time they notify the Interconnection Customer with the supplemental review results, and offer the options set forth in Section 5.4.3 above. If the Interconnection Customer does not make an election within fifteen (15) Business Days, the CAISO will deem the Interconnection Request withdrawn.

Attachment C – Marked Tariff Records

Compliance Filing – Interconnection Process Enhancements, Topics 4 and 5

California Independent System Operator Corporation

1.3 Pre-Application

1.3.1 An Interconnection Customer with a proposed Small Generating Facility may submit a formal written request form along with a non-refundable fee of \$300 to the CAISO for a pre-application report on a proposed project at a specific site. The CAISO shall provide the pre-application data described in Section 1.3.2 to the Interconnection Customer within twenty (20) Business Days of receipt of the completed request form and payment of the \$300 fee. The CAISO shall coordinate with the Participating TO to complete the pre-application report. At the request of the CAISO, the Participating TO shall provide any readily available information necessary to complete the pre-application report. Readily available information shall mean information that the Participating TO currently has on hand. The Participating TO is not required to create new information but is required to compile, gather, and summarize information that it has on hand in a format that presents the information in a manner that informs the Interconnection Customer regarding issues related to its proposed Small Generating Facility. If providing any item in the pre-application report would require the Participating TO to perform a study or analysis beyond gathering and presenting existing information, then the information shall be deemed not readily available. The pre-application report produced by the CAISO is non-binding, does not confer any rights, and the Interconnection Customer must still successfully apply to interconnect to the CAISO's system. The written pre-application report request form shall include the information in Sections 1.3.1.1 through 1.3.1.8 below to clearly and sufficiently identify the location of the proposed Point of Interconnection that is under CAISO operational control.

1.3.1.1 Project contact information, including name, address, phone number, and email address.

1.3.1.2 Project location (street address with nearby cross streets and town).

1.3.1.3 Single proposed Point of Interconnection that is either an existing substation or a transmission line under CAISO operational control.

1.3.1.4 Generator Type (e.g., solar, wind, combined heat and power, etc.)

1.3.1.5 Size (alternating current kW/MW)

1.3.1.6 Single or three phase generator configuration

1.3.1.7 Stand-alone generator (no onsite load, not including station service – Yes or No?)

1.3.1.8 Is new service requested? Yes or No? If there is existing service, include the customer account number, site minimum and maximum current or proposed electric loads in kW/MW (if available) and specify if the load is expected to change.

1.3.2 Subject to Section 1.3.1, the pre-application report will include the following information:

1.3.2.1 Electrical configuration of the substation, including information of transmission lines terminating in the substation, transformers, buses and other devices, if the proposed Point of Interconnection is a substation.

- 1.3.2.2 Existing aggregate generation capacity (in MW) interconnected to a substation or circuit (i.e., amount of generation online) likely to serve the proposed Point of Interconnection.
- 1.3.2.3 Aggregate queued generation capacity (in MW) for a substation or circuit (i.e., amount of generation in the queue) likely to serve the proposed Point of Interconnection.
- 1.3.2.4 Based on the proposed Point of Interconnection, existing or known constraints such as, but not limited to, electrical dependencies at that location, short circuit issues, instability issues, facility loading issues, or voltage issues.
- 1.3.2.5 Available capacity on a substation or circuit likely to serve the proposed Point of Interconnection.

* * *

4.4.54 If requested by the Interconnection Customer, a Results Meeting shall be held among the CAISO, the applicable Participating TO(s), and the Interconnection Customer to discuss the results of the system impact and facilities study report, including assigned cost responsibility. The CAISO shall prepare minutes from the meeting. Any such Results Meeting will be held within twenty (20) Business Days of the date the system impact and facilities study report is provided to the Interconnection Customer.

Should the Interconnection Customer provide written comments on the system impact and facilities study report within ten (10) Business Days of receipt of the report, but in no event fewer than three (3) Business Days before the Results Meeting conducted to discuss the report, whichever is sooner, the CAISO will address the written comments in the Results Meeting. Should the Interconnection Customer provide comments at any later time (up to the time of the Results Meeting), then such comments shall be considered informal inquiries to which the CAISO will provide informal, informational responses at the Results Meeting, to the extent possible. The Interconnection Customer may submit, in writing, additional comments on the final system impact and facilities study report up to three (3) Business Days following the Results Meeting.

Based on any discussion at the Results Meeting and any comments received, the CAISO (in consultation with the applicable Participating TO(s)) will determine whether it is necessary to follow the final system impact and facilities study report with a revised study report or an addendum. The CAISO will issue any such revised report or addendum to the Interconnection Customer no later than fifteen (15) Business Days following the Results Meeting.

Upon request, the CAISO shall provide the Interconnection Customer all supporting documentation, workpapers, and relevant pre-Interconnection Request and post-Interconnection Request power flow, short circuit, and stability databases for the final system impact or facilities study, subject to confidentiality arrangements consistent with Section 15.1.

* * *

5.1 Applicability and Initiation of Fast Track Process Request

Applicability to a proposed Generating Facility. An Interconnection Customer may request interconnection of a proposed Generating Facility to the CAISO Controlled Grid under the Fast Track Process if the Generating Facility is no larger than 5 MW and is requesting Energy-Only Deliverability Status and if the Interconnection Customer's proposed Generating Facility meets the codes, standards, and certification requirements of Appendices 9 and 10 of this GIDAP, or if the applicable Participating TO notifies the CAISO that it has reviewed the design for or tested the proposed Small Generating Facility and has determined that the proposed Generating Facility may interconnect consistent with Reliability Criteria and Good Utility Practice.

Applicability to an existing Generating Facility. If the Interconnection of an existing Generating Facility meets the qualifications for Interconnection under CAISO Tariff Section 25.1(d) or (e) but, at the same time, the Interconnection Customer also seeks to repower or reconfigure the existing Generating Facility in a manner that increases the gross generating capacity by not more than 5 MW, then the Interconnection Customer may request that the Fast Track Process be applied with respect to the repowering or reconfiguration of the existing Generating Facility that results in the incremental increase in MW.

Initiating the Fast Track Interconnection Request. To initiate an Interconnection Request under the Fast Track Process, and have the Interconnection Request considered for validation the Interconnection Customer must provide the CAISO with:

- (i) a completed Interconnection Request as set forth in Appendix 1;
- (ii) a ~~study deposit of \$1,000~~non-refundable processing fee of \$500; and
- (iii) a demonstration of Site Exclusivity. For the Fast Track Process, such demonstration may include documentation reasonably demonstrating a right to locate the Generating Facility on real estate or real property improvements owned, leased, or otherwise legally held by another.

The CAISO shall review and validate the Fast Track Process Interconnection Request pursuant to Section 5.2.

In the event of a conflict between this Section 5 and another provision of this GIDAP, Section 5 shall govern.

5.2 Initial Review

Within ~~fifteen thirty~~ (1530) ~~Business-Calendar~~ Days after the CAISO notifies the Interconnection Customer that the Interconnection Request is deemed complete, valid, and ready to be studied, the applicable Participating TO shall perform an initial review using the screens set forth in Section 5.3 below, and shall notify the Interconnection Customer of the results; ~~and shall include with the notification copies of the analysis in a report that provides the details of~~ and data underlying the Participating TO's determinations under the screens.

5.3-2.1 Screens

~~5.3.1 The proposed Generating Facility must pass the following screens to be eligible for interconnection under this Fast Track Process:~~

~~5.32.1.1 The proposed Generating Facility's Point of Interconnection must be on the CAISO Controlled Grid.~~

~~5.32.1.2 For interconnection of a proposed Generating Facility to a radial transmission circuit on the CAISO Controlled Grid, the aggregated generation on the circuit, including the proposed Generating Facility, shall not exceed 15 percent of the line section annual peak load as most recently measured at the substation. For purposes of this Section 5.23.1.2, a line section shall be considered as that portion of a Participating TO's electric system connected to a customer bounded by automatic sectionalizing devices or the end of the transmission line.~~

~~This screen will not be required for a proposed interconnection of a Generating Facility to a radial transmission circuit with no load.~~

~~In cases where the circuit lacks the telemetry needed to provide the annual peak load measurement data, the CAISO shall use power flow cases from the latest completed Queue Cluster studies (either Phase I or Phase II) to perform this screen.~~

~~5.32.1.3 For interconnection of a proposed Generating Facility to the load side of spot network protectors, the proposed Generating Facility must utilize an inverter-based equipment package and, together with the aggregated other inverter-based generation, shall not exceed the smaller of 5 percent of a spot network's maximum load or 50 kW. For purposes of this Section 5.3.1.3, a spot network shall be considered as a type of distribution system found in modern commercial buildings for the purpose of providing high reliability of service to a single retail customer. **[Not Used]**~~

~~5.32.1.4 The proposed Generating Facility, in aggregate~~tion~~ with other Generating Facilities generation on the transmission circuit, shall not contribute more than 10 percent to the transmission circuit's maximum fault current at the point on the high voltage (primary) level nearest the proposed point of change of ownership.~~

~~The CAISO shall use the short circuit study data from the latest completed Queue Cluster studies (either Phase I or Phase II) to test this screen.~~

~~5.32.1.5 The proposed Generating Facility, in aggregate with other Generating Facilities generation on the transmission circuit, shall not cause any transmission protective devices and equipment (including, but not limited to, substation breakers, fuse cutouts, and line reclosers), or Interconnection Customer equipment on the system to exceed 87.5 percent of the short circuit interrupting capability; nor shall the interconnection be proposed for a circuit that already exceeds 87.5 percent of the short circuit interrupting capability.~~

~~The CAISO shall use the short circuit study data from the most recently completed Queue Cluster studies (either Phase I or Phase II) to test this screen.~~

~~5.32.1.6 A Generating Facility will fail this initial review, but will be eligible for a supplemental review, if it proposes to interconnect in an area where there are known transient stability, voltage, or thermal limitations identified in the most recently completed Queue Cluster~~

~~studies or transmission planning process. Generating Facility, in aggregate with other generation interconnected to the transmission side of a substation transformer feeding the circuit where the Generating Facility proposes to interconnect shall not exceed 10 MW in an area where there are known, or posted, transient stability limitations to generating units located in the general electrical vicinity (e.g., three or four transmission busses from the Point of Interconnection).~~

~~5.32.1.7 No construction of facilities by a Participating TO on its own system shall be required to accommodate the proposed Generating Facility.~~

~~5.32.2~~ If the proposed interconnection passes the screens ~~and no Upgrades are reasonably anticipated~~, the Interconnection Request shall be approved. Within fifteen (15) Business Days thereafter, the Participating TO will provide the Interconnection Customer with a Small Generator Interconnection Agreement for execution.

~~5.32.3~~ If the proposed interconnection fails the screens ~~and no Upgrades are reasonably anticipated~~, but the CAISO and Participating TO determine that the Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards under these procedures, the Participating TO shall, within fifteen (15) Business Days, provide the Interconnection Customer with a Small Generator Interconnection Agreement for execution

~~5.32.4~~ If the proposed interconnection ~~passes-fails~~ the screens and ~~the CAISO and Participating TO do not or cannot determine from the initial review that the Generating Facility may nevertheless be interconnected consistent with safety, reliability, and power quality standards unless the Interconnection Customer is willing to consider minor modifications or further study, Upgrades are reasonably anticipated~~, the ~~CAISO and~~ Participating TO shall provide the Interconnection Customer with the opportunity to attend a customer options meeting as described in Section 5.4.

~~5.3 [Not Used]~~

5.4 Customer Options Meeting

If the CAISO and Participating TO determine the Interconnection Request cannot be approved without (1) minor modifications at minimal cost; (2) or a supplemental study or other additional studies or actions; or (3) incurring at-significant cost to address safety, reliability, or power quality problems, ~~within the five (5) Business Day period after the determination~~, the CAISO and Participating TO shall notify the Interconnection Customer ~~and within five (5) Business Days of that determination and~~ provide copies of all data and analyses underlying ~~its-their~~ conclusion. Within ten (10) Business Days of the CAISO and Participating TO's determination, the CAISO and Participating TO shall offer to convene a customer options meeting with the CAISO and Participating TO to review possible Interconnection Customer facility modifications or the screen analysis and related results, to determine what further steps are needed to permit the ~~Small~~ Generating Facility to be connected safely and reliably. At the time of notification of the CAISO and Participating TO's determination, or at the customer options meeting, the CAISO and Participating TO shall:

~~5.4.1~~ Offer to perform facility modifications or modifications to the Participating TO's electric system (e.g., changing meters, fuses, relay settings) and provide a non-binding good faith estimate of the limited cost to make such modifications to the Participating TO's electric system.; If the Interconnection Customer agrees to pay for the modifications to

the Participating TO's electric system, the Participating TO will provide the Interconnection Customer with an executable interconnection agreement within ten (10) Business Days of the customer options meeting; or

5.4.2 Offer to perform a supplemental review in accordance with Section 5.5 and provide a non-binding good faith estimate of the costs of such review; or

~~f the CAISO and Participating TO concludes that the supplemental review might determine that the Generating Facility continue to qualify for interconnection pursuant to the Fast Track Process, and provide a non-binding good faith estimate of the costs of such review.~~

~~**5.4.3** Obtain the Interconnection Customer's agreement to continue evaluating the Interconnection Request under the Independent Study Process or Cluster Study Process.~~

~~**5.4.3** Offer to include the Interconnection Request in either the next Queue Cluster Window or the Independent Study Process, subject to the eligibility criteria set forth in Section 4.1, and the provision of the study deposit set forth in Section 3.5. Within fifteen (15) Business Days of the customer options meeting the Interconnection Customer shall provide the CAISO, in writing, with its election on how to proceed with its Interconnection Request. If the Interconnection Customer does not make an election within this time period, the CAISO will deem the Interconnection Request withdrawn.~~

5.5 Supplemental Review

~~**5.5.1** If the Interconnection Customer agrees to a~~ To accept the offer of a supplemental review, the Interconnection Customer shall agree in writing ~~within fifteen (15) Business Days of the offer,~~ and submit a deposit for the estimated costs of the supplemental review in ~~thean~~ amount ~~reasonably of the good faith estimate~~ determined by the CAISO and Participating TO, both within fifteen (15) Business Days of the offer, or elect one of the options set forth in Section 5.4.3.

~~**5.5.2** The Interconnection Customer may specify the order in which the CAISO and Participating TO will complete the screens in Section 5.5.4.~~

~~**5.5.3** The Interconnection Customer shall be responsible for the CAISO and Participating TO's actual costs for conducting the supplemental review. The Interconnection Customer must pay any review costs that exceed the deposit within twenty (20) Business Days of receipt of the invoice or resolution of any dispute. If the deposit exceeds the invoiced costs, the CAISO and Participating TO will return such excess, without interest, within twenty (20) Business Days of the invoice.~~

~~**5.5.15.5.4** Within ~~ten thirty~~ (340) Business Days following receipt of the deposit for a supplemental review, or some longer period agreed to by the Interconnection Customer, CAISO, and Participating TO, the CAISO and Participating TO ~~will determine shall~~ (1) perform a supplemental review using the screens set forth below; (2) notify in writing the Interconnection Customer of the results; and (3) include with the notification copies of the analysis and data underlying the CAISO and Participating TO's determinations under the screens. Unless the Interconnection Customer provided instructions for how to respond to the failure of any of the supplemental review screens below at the time the Interconnection Customer accepted the offer of supplemental review, the CAISO and Participating TO shall notify the Interconnection Customer following the failure of any of~~

the screens, or if they are unable to perform the screen in Section 5.5.4.1, within two (2) Business Days of making such determination to obtain the Interconnection Customer's permission to: (1) continue evaluating the proposed interconnection under this Section 5.5.4; (2) terminate the supplemental review and offer the Interconnection Customer the options set forth in Section 5.4.3; or (3) terminate the supplemental review upon withdrawal of the Interconnection Request by the Interconnection Customer.

In conducting these screens, the CAISO and Participating TO will use power flow or short circuit study data from the most recently completed Queue Cluster studies (either Phase I or Phase II).

5.5.4.1 Minimum Load Screen: Where 12 months of line section minimum load data (including onsite load but not station service load served by the proposed Generating Facility) are available, can be calculated, can be estimated from existing data, or determined from a power flow model, the aggregate Generating Facility capacity on the line section is less than 100 percent of the minimum load for all line sections bounded by automatic sectionalizing devices upstream of the proposed Generating Facility. If minimum load data is not available, or cannot be calculated, estimated or determined, the CAISO and Participating TO shall include the reason(s) that they are unable to calculate, estimate or determine minimum load in their supplemental review results notification under Section 5.5.4.

5.5.4.1.1 The type of generation used by the proposed Generating Facility will be taken into account when calculating, estimating, or determining circuit or line section minimum load relevant for the application of screen 5.5.4.1. Solar photovoltaic (PV) generation systems with no battery storage use daytime minimum load (i.e. 10 a.m. to 4 p.m. for fixed panel systems and 8 a.m. to 6 p.m. for PV systems utilizing tracking systems), while all other generation uses absolute minimum load.

5.5.4.1.2 When this screen is being applied to a Generating Facility that serves some station service load, only the net injection into the Participating TO's electric system will be considered as part of the aggregate generation.

5.5.4.1.3 The CAISO and Participating TO will not consider as part of the aggregate generation for purposes of this screen generating facility capacity known to be already reflected in the minimum load data.

5.5.4.2 Voltage and Power Quality Screen: In aggregate with existing generation on the line section, the proposed Generating Facility shall not cause the violation of voltage standards, as set forth in the CAISO's Planning Standards, on any part of the CAISO Controlled Grid.

5.5.4.3 Safety and Reliability Screen: The location of the proposed Generating Facility and the aggregate generation capacity on the line section do not create impacts to safety or reliability that cannot be adequately addressed without studying the Generating Facility in either the Queue Cluster or Independent Study processes. The CAISO and Participating TO shall give due consideration to the following

and other factors in determining potential impacts to safety and reliability in applying this screen.

5.5.4.3.1 Whether the line section has significant minimum loading levels dominated by a small number of customers (e.g., several large commercial customers).

5.5.4.3.2 Whether the loading along the line section uniform or even.

5.5.4.3.3 Whether the proposed Generating Facility is located in close proximity to the substation (i.e., less than 2.5 electrical circuit miles), and whether the line section from the substation to the Point of Interconnection is a Mainline rated for normal and emergency ampacity. For purposes of this screen, a Mainline is the three-phase backbone of a circuit and will typically constitute lines with wire sizes of 4/0 American wire gauge, 336.4 kcmil, 397.5 kcmil, 477 kcmil and 795 kcmil.

5.5.4.3.4 Whether the proposed Generating Facility incorporates a time delay function to prevent reconnection of the generator to the system until system voltage and frequency are within normal limits for a prescribed time.

5.5.4.3.5 Whether operational flexibility is reduced by the proposed Generating Facility, such that transfer of the line section(s) of the Generating Facility to a neighboring circuit/substation may trigger overloads or voltage issues.

5.5.4.3.6 Whether the proposed Generating Facility employs equipment or systems certified by a recognized standards organization to address technical issues such as, but not limited to, islanding, reverse power flow, or voltage quality.

5.5.5 If the proposed interconnection passes the supplemental screens in Sections 5.5.4.1, 5.5.4.2, and 5.5.4.3 above, the Interconnection Request shall be approved and the Participating TO will provide the Interconnection Customer with an executable interconnection agreement within the timeframes established in Sections 5.5.5.1 and 5.5.5.2 below. If the proposed interconnection fails any of the supplemental review screens and the Interconnection Customer does not withdraw its Interconnection Request, it shall be treated in accordance with Section 5.5.5.3 below.

5.5.5.1 If the proposed interconnection passes the supplemental screens in Sections 5.5.4.1, 5.5.4.2, and 5.5.4.3 above and does not require construction of facilities by the Participating TO on its own system, the interconnection agreement shall be provided within ten (10) Business Days after the notification of the supplemental review results.

5.5.5.2 If interconnection facilities or minor modifications to the Participating TO's system are required for the proposed interconnection to pass the supplemental screens in Sections 5.5.4.1, 5.5.4.2, and 5.5.4.3 above, and the Interconnection Customer agrees to pay for the modifications to the Participating TO's electric system, the interconnection agreement, along with a non-binding good faith estimate for the interconnection facilities and/or minor modifications, shall be provided to the Interconnection Customer within fifteen (15) Business Days after receiving written notification of the supplemental review results.

5.5.5.3 If the proposed interconnection would require more than interconnection facilities or minor modifications to the Participating TO's system to pass the supplemental screens in Sections 5.5.4.1, 5.5.4.2, and 5.5.4.3 above, the CAISO and Participating TO shall notify the Interconnection Customer, at the same time they notify the Interconnection Customer with the supplemental review results, and offer the options set forth in Section 5.4.3 above. If the Interconnection Customer does not make an election within fifteen (15) Business Days, the CAISO will deem the Interconnection Request withdrawn.

~~5.5.1.1~~ If so, then, within fifteen (15) Business Days of such a determination, the Participating TO shall forward a Small Generator Interconnection Agreement to the Interconnection Customer for execution.

~~5.5.1.2~~ If so, and Interconnection Customer facility modifications are required to allow the Generating Facility to be interconnected consistent with safety, reliability, and power quality standards, the Participating TO shall forward a Small Generator Interconnection Agreement to the Interconnection Customer for execution within fifteen (15) Business Days after confirmation that the Interconnection Customer has agreed to pay for the identified modifications to the Participating TO's electric system.

~~5.5.1.3~~ If so, and Upgrades to the Participating TO's electric system are required to allow the Small Generating Facility to be interconnected consistent with safety, reliability, and power quality standards, the Participating TO shall forward a Small Generator Interconnection Agreement to the Interconnection Customer for execution within fifteen (15) Business Days that requires the Interconnection Customer to pay the costs of such system modifications prior to interconnection.

~~5.5.2~~ If not, the Interconnection Request will be deemed withdrawn, without prejudice to the Interconnection Customer resubmitting its Interconnection Request for processing in either a Queue Cluster or under the Independent Study Process.