

Stakeholder Comments Template

Generator Interconnection: Transmission Development Forum

Submitted by	Organization	Date Submitted
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EDF-R appreciates the CAISO hosting the quarterly Transmission Development Forum as well as the CPUC’s participation in the July forum.

EDF-R appreciates and supports PG&E’s enthusiasm for the forum and encourages all the PTOs to consider the best vehicle to deliver more reactive updates when in-service dates for transmission or related generation projects are close at hand. Perhaps the CAISO can create a standardized format for a notice in the daily briefing, similar to how Business Practice Manual (BPM) Proposed Revision Requests (PRR) statuses are communicated.

To that end EDF-R would like to highlight the following two items:

- EDF-R requests PTOs identify and share potential equipment delays that could impact project’s ISD or COD within timeframe that would allow for mitigation to stay on track – in other words, if PTOs make ICs aware of a delay 45 days before ISD not much can be done to accelerate. If this information is shared 6 months in advance there is more that can be done to mitigate the delay.
- EDF-R requests that PTOs consider accepting material support from the IC if it will mitigate the delay. For example, in the past EDF-R has offered to procure delayed equipment through its own contracts and contacts to mitigate a delayed milestone and the PTO rejected the offer. EDF-R is seeking to partner in solutions for these issues requests clarification on if this sort of assistance is prohibited for any reason.