

**Stakeholder Comments Template**

**Subject: Generation Interconnection Procedures Phase 2 (“GIP 2”)**

This template was created to help stakeholders structure their written comments on topics detailed in the July 5, 2011 *Revised Draft Final Proposal for Generation Interconnection*

Submitted by	Company	Date Submitted
Evelyn Kahl Tim Lindl Alcantar & Kahl LLP <a href="mailto:ek@a-klaw.com">ek@a-klaw.com</a> <a href="mailto:tjl@a-klaw.com">tjl@a-klaw.com</a> (415) 421-4143	On behalf of the Energy Producers and Users Coalition	July 14, 2011

*Procedures 2 (GIP 2) Proposal* (at <http://www.caiso.com/2b21/2b21a4fe115e0.html>).

We ask that you please submit your comments in MS Word *no later than the close of business on July 14, 2011* so that there will be time to include them in Board documents.

Your comments will be most useful if you provide the reasons and the business case for your preferred approaches to these topics.

Please also respond to the question “Do you support the proposal?” for each item listed below.

**Comments on topics listed in GIP 2 Draft Final Proposal:**

EPUC supports many of the concepts included in CAISO’s proposals but conditions its support upon the drafting of appropriate tariff language and proper implementation. It has no comment on topics in Work Groups 1, 2, 4 and 5 and limited comments on topics in Work Group 3. The absence of EPUC comments in these areas should not be interpreted as an endorsement of CAISO’s approach.

The advancement of the AB 1613 under 20 MW CHP program and the recent conclusion of the CHP settlement, which creates new pro forma contracts for existing generators, will create demand for expedited interconnection of new and expanded CHP capacity. The achievement of the state’s CHP goals depends upon efficient interconnection processes in the same way as the achievement of the state’s Renewable Portfolio Standard goals.

**Work Group 3**

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**6. Interconnection Refinements to Accommodate QF conversions, Repowering, Behind the meter expansion, Deliverability at the Distribution Level and Fast Track and ISP improvements****a. Application of Path 1-5 processes****Do you support the proposal?**

EPUC supports the proposed concepts, as discussed below.

**Comments:**

The CAISO proposal creates five paths for interconnection:

1. **The interconnection procedures do not apply** if a generator makes changes to its facility that maintain its nameplate capacity and “*will not cause a potential violation of Applicable Reliability Criteria.*” CAISO also states that a QF will be able to maintain its existing interconnection agreement and deliverability status if changes to its facility do not alter a QF’s “*commercial status*” and “*do not implicate the interconnection processes.*”

EPUC supports the CAISO proposal.

2. A generator may use the existing **Section 25 affidavit approach** if the generator is converting from “*QF to PGA status*” and is not repowering or reconfiguring its facility.

EPUC supports the CAISO proposal.

3. The **Fast Track** process may be used if the generator incrementally increases its gross capacity 5 MW, or less, and can pass the existing Fast Track screens.

EPUC proposed using Fast Track as an interconnection solution for incremental capacity projects of 20 MW or less, which have a minimal impact on the grid, but do not satisfy the electrical independence tests of the Independent Study Process (ISP).

EPUC supports the CAISO Path 3 proposal as a step forward but continues to question the arbitrary 5 MW limit.

4. A generator may use the **ISP** to repower or reconfigure its facilities so long as it passes the tests related to electrical independence. CAISO proposes an **alternative for behind-the-meter additions** of capacity that do not satisfy the ISP’s flow-based test. The capacity additions must satisfy several technical and business criteria to ensure that output from the generator does not exceed the amount of capacity studied in the unit’s generator interconnection agreement.

EPUC supports this proposal as an alternative ISP path.

5. If a generator makes changes to its facilities that do not qualify for the preceding four paths, it would enter the **cluster study process**.

EPUC neither supports nor opposes this proposal.

#### **b. Maintaining Deliverability upon QF Conversion**

##### **Do you support the proposal?**

EPUC supports the CAISO proposal to maintain a generator's deliverability status upon conversion from "*QF to PGA status*".