

To: California Independent System Operator (CAISO)
From: California Independent Energy Producers (IEP)
Date: April 26, 2012
Subject: **Comments Regarding the April 19, 2012 Draft Tariff Language for the Generator Interconnection and Deliverability Allocation Procedures Amendment Filing**

IEP appreciates the opportunity to provide the following comments with respect to the Draft Tariff Language Stakeholder Review for the Generator Interconnection and Deliverability Allocation Procedures (“GIDAP”) Amendment Filing as published by the CAISO on April 19, 2012.

Request to Modify

During the last TPP-GIP stakeholder call regarding the March 22, 2012 version of the draft Generator Interconnection and Transmission Allocation Procedure (“GITAP”) language, IEP requested confirmation from the CAISO that section 8.9.5 addresses situations where a project is partially contracted. Specifically, IEP sought the ISO’s confirmation that, under the draft tariff, a project that was allocated deliverability equal to its interconnection request but whose contracted capacity was lower than its interconnection request, could accept TP deliverability equal to contracted quantity, and all other aspects of that section would apply to the balance of the capacity.

In addition, IEP requested that the CAISO draft changes in Section 8.9.2 (1) and 8.9.2 (2) of the GITAP with respect to use of the term “entire” Generating Facility, and 8.9.2 (2)b would require revision with respect to use of the term “full” MW generating capacity, as required to support the applicability of Section 8.9.5 to partially PPA’d projects.

The CAISO’s response to IEP’s inquiry in this matter confirmed the applicability of the provisions of Section 8.9.5 to generation projects that are allocated TP deliverability for their full requested amount, but who chose to accept an amount of TP deliverability corresponding to their existing PPA(s). Accordingly, the CAISO indicated that conforming changes would be drafted in Sections 8.9.2 as described above. Unfortunately, those changes were not incorporated in the April 19, 2012 draft of the GIDAP.

IEP requests that the CAISO modify the GIDAP as expeditiously as practicable as per the interpretation it has confirmed with IEP as noted above, specifically addressing the change in language necessary in Sections 8.9.2(1)-(2),