

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the 2015 Interconnection Process Enhancements (IPE) Draft Final Proposal that was posted on July 6, 2015 and as supplemented by the presentation and discussion during the July 13, 2015 stakeholder meeting.

Submit comments to InitiativeComments@caiso.com

Comments are due July 27, 2015 by 5:00pm

The Draft Final Proposal posted on July 6, 2015 may be found at:

http://www.caiso.com/Documents/DraftFinalProposal_InterconnectionProcessEnhancements-2015.pdf

The presentation discussed during the July 13, 2015 stakeholder meeting may be found at:

<http://www.caiso.com/Documents/Agenda-Presentation-InterconnectionProcessEnhancements2015-DraftFinalProposal.pdf>

For each topic that was modified in the Draft Final Proposal please select one of the following options to indicate your organization's overall level of support for the CAISO's proposal:

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

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

Topic 1 – Affected Systems

IEP supports the proposal with qualifications.

In its June 1st comments IEP reiterated its support for a broader initiative to address the potential for standardization of Affected Systems processes among TO's to insure clarity and improve process time lines. IEP appreciates the ISO's comments in the final draft about considering further work on these issues, albeit not in the current initiative.

While IEP supports the vast majority of the final draft proposal on this topic, there is concern about Affected Systems being allowed to respond to the ISO's notification out of time, meaning, later than 60 days after notice has been sent by the ISO – assuming the ISO sent notice. IEP is concerned that this language weakens a key component of the original proposal, namely the 60 days response deadline and the enhanced certainty regarding study timelines and costs to the interconnecting customer that the deadline could create. The circumstances under which a system may not speak up are themselves somewhat confusing. It appears from the ISO's proposal that an "after-the-fact" response by a notified potential Affected System would take place under two possible scenarios. Scenario 1: An Affected System may not have been identified by the ISO in the first place, and by logic would miss the response deadline. The ISO says it casts a broad net with respect to sending notice to potentially Affected Systems but mistakes could be made. It appears to IEP that the ISO may best address the potential for "missing" an Affected System, by sending out a notice to all interconnected systems with the explanation that they have a responsibility to review the interconnection queued projects under study to determine if they are indeed an Affected System and must notify the ISO within 60 days.

Scenario 2: A system, previously notified by the ISO of the potential to be an Affected System that either didn't reply in 60 days or responded that they weren't "affected", later claims to be affected due to a change in "facts." IEP recommends that any system that claims to be an Affected System after the 60 day window should be only allowed to do so if they had previously responded to the ISO's notice within the window stating that at that time of their response didn't believe they were "affected". Those systems that don't reply to the notice should lose the right to speak up later or the effectiveness of the response window will be degraded.

As suggested, those systems that respond within the 60 days by indicating they are not "affected" but later learn that facts have changed should be the only systems afforded to later claim Affected System status. Moreover, since facts themselves are not automatically material for this determination, the ISO's proposal doesn't address specifically how a fact or set of facts will be determined to be material for purposes of allowing a late response. IEP is not suggesting that the ISO attempt to identify every set of circumstances that would qualify "new facts" as material. IEP would suggest, however, that the IEP indicate in the tariff language that a determination of materiality will be conducted, and that if the new "facts" are not found to be material, that the tardy system will not be allowed the security of the late response.

IEP would prefer to see the ISO modify the proposal to (a) notify all systems, whether or not they may be identified by the ISO as potentially Affected Systems, and (b) keep the 60 day response requirement in place, only allowing exceptions in the cases of “material and unforeseen facts” that make the determination of a system’s affected status or likely affected status impossible to have known within the 60 days notification window. If the ISO intends the 60 days window to be compelling, IEP suggests that the proposal be modified as described.

Topic 2 – Time-In-Queue Limitations

IEP supports the proposal

Topic 3– Negotiation of Generator Interconnection Agreements

IEP supports the proposal