

Stakeholder Comments Template

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

Submitted by	Company	Date Submitted
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This template was created to help stakeholders structure their written comments on topics detailed in the April 14, 2011 *Straw Proposal for Generation Interconnection Procedures 2 (GIP 2) Proposal* (at <http://www.caiso.com/2b21/2b21a4fe115e0.html>). We ask that you please submit your comments in MS Word to GIP2@caiso.com no later than the close of business on May 5, 2011.

Your comments on any these issues are welcome and will assist the ISO in the development of the draft final proposal. Your comments will be most useful if you provide the reasons and the business case for your preferred approaches to these topics.

Your input will be particularly valuable to the extent you can provide greater definition and clarity to each of the proposals as well as concerns you may have with implementation or effectiveness.

Comments on topics listed in GIP 2 Straw Proposal:**Work Group 1**

1. Develop procedures and tariff provisions for cost assessment provisions.

Comments:

2. Clarify Interconnection Customer (IC) cost and credit requirements when GIP network upgrades are modified in the transmission planning process (per the new RTPP provisions)

Comments:

Work Group 2

3. Participating Transmission Owner (PTO) transmission cost estimation procedures and per-unit upgrade cost estimates;

Comments:

4. Generators interconnecting to non-PTO facilities that reside inside the ISO Balancing Area Authority (BAA);

Comments:

There needs to be a distinction between projects that have already entered into agreements with a PTO for third-party affected System Impact Studies and projects that have not. Projects connecting into non-PTO areas of the CAISO BAA that have already undergone or are currently undergoing System Impact Studies conducted by the affected PTO with input from the CAISO have sufficiently satisfied the need for ISO participation in the interconnection process for the project. The only remaining study to be performed by CAISO is the deliverability analysis. In this case the deposit requirements should be reduced from the standard interconnection fee structure to bring it in line with the reduced scope of work.

5. Triggers that establish the deadlines for IC financial security postings.

Comments:

6. Clarify definitions of start of construction and other transmission construction phases, and specify posting requirements at each milestone.

Comments:

7. Improve process for interconnection customers to be notified of their required amounts for IFS posting

Comments:

8. Information provided by the ISO (Internet Postings)

Comments:

Work Group 3

9. Develop pro forma partial termination provisions to allow an IC to structure its generation project in a sequence of phases.

Comments:

10. Reduction in project size for permitting or other extenuating circumstances

Comments:

11. Repayment of IC funding of network upgrades associated with a phased generation facility.

Comments:

12. Clarify site exclusivity requirements for projects located on federal lands.

Comments:

13. Interconnection Refinements to Accommodate QF conversions, Repowering, Behind the meter expansion, Deliverability at the Distribution Level and Fast Track and ISP improvements

a. Fast Track application to facility repowerings

Comments:

b. QF Conversion

Comments:

c. Behind the meter expansion

Comments:

d. Distribution level deliverability

Comments:

Work Group 4

14. Financial security posting requirements where the PTO elects to upfront fund network upgrades.

Comments:

15. Revise ISO insurance requirements (downward) in the pro forma Large Generation Interconnection Agreement (LGIA) to better reflect ISO's role in and potential impacts on the three-party LGIA.

Comments:

16. Standardize the use of adjusted versus non-adjusted dollar amounts in LGIAs.

Comments:

17. Clarify the Interconnection Customers financial responsibility cap and maximum cost responsibility

Comments:

18. Consider adding a "posting cap" to the PTO's Interconnection Facilities

Comments:

Work Group 5

19. Partial deliverability as an interconnection deliverability status option.

Comments:

20. Conform technical requirements for small and large generators to a single standard

Comments:

21. Revisit tariff requirement for off-peak deliverability assessment.

Comments:

22. Annual updating of ISO's advisory course on partial deliverability assessment

Comments:

23. CPUC Renewable Auction Mechanism requirement for projects to be in an interconnection queue to qualify

Comments:

Other Comments:

1. Provide comments on proposals submitted by stakeholders.
2. If you have other comments, please provide them here.