

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 July 5, 2011 *Revised Draft Final 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 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:**Work Group 1**

The ISO has determined that WG 1 topics should be taken out of the GIP 2 scope and addressed in a separate initiative with its own timeline

Work Group 2

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

Do you support the proposal?

Comments:

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

Do you support the proposal? Yes

Comments: **Certain important aspects of the proposal were explained by CAISO staff at the July 7th stakeholder meeting but were not specifically listed in the Revised Draft Final Proposal:**

- **While an interconnecting project would be allocated costs for deliverability network upgrades in the same manner as other projects in the cluster study group, the project would also be eligible for Network Upgrade costs refunds.**
- **Projects that are currently existing or proceeding through the non-PTO interconnection process are eligible for the deliverability study.**
- **The requirement for ISO participation in the interconnection process for a project connecting to a non-PTO facility in the BAA would be deemed satisfied if a PTO studied the project as an affected system**

These aspects of the proposal should be included in the Final Proposal to conform to the verbal explanation presented by ISO staff.

In addition, the proposal should state that the requirement for full deliverability to the ISO has been met if there is a contractual agreement with the non-PTO to provide firm transmission service on the non-PTO's system to the interface with the ISO controlled grid. This will eliminate the uncertainty of a case-by-case assessment.

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

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

6. Information provided by the ISO (Internet Postings)

Do you support the proposal?

Comments:

Work Group 3

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

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

11. CPUC Renewable Auction Mechanism

Do you support the proposal?

Comments:

12. 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?

Comments:

b. Maintaining Deliverability upon QF Conversion

Do you support the proposal?

Comments:

c. Distribution Level Deliverability

Do you support the proposal?

Comments:

Work Group 4

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

Do you support the proposal?

Comments:

14. 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.

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

18. Consider using generating project viability assessment in lieu of financial security postings

Do you support the proposal?

Comments:

19. Consider limiting interconnection agreement suspension rights

Do you support the proposal?

Comments:

20. Consider incorporating PTO abandoned plant recovery into GIP

Do you support the proposal?

Comments:

Work Group 5

21. Partial deliverability as an interconnection deliverability status option.

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

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

Do you support the proposal?

Comments:

24. Operational partial and interim deliverability assessment

Do you support the proposal?

Comments:

25. Post Phase II re-evaluation of the plan of service

Do you support the proposal?

Comments:

Other Comments:

1. If you have other comments, please provide them here.