

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 February 24, 2011 *Issue Paper for Generation Interconnection Procedures 2 (GIP-2) Proposal* (at <http://www.aiso.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 March 10, 2011*. For the 21 topics listed below, we ask that you rank each with a score of 0, 1, 2, or 3 in the space indicated (a more detailed description of each topic is contained in the *Issue Paper* at the link, above).

- 3: For topics that are high priority and urgent.
- 2: For topics that are high priority but not urgent.
(i.e., topic could wait until a subsequent GIP stakeholder initiative).
- 1: For topics that have low priority.
- 0: For topics in which “the ISO need not bother.”

Stakeholders need not rank or comment on every topic but are encouraged to do so where they have an opinion. The ISO will assume that a stakeholder has “no opinion” on issues for which no rank is provided.

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

Comments on Items listed in GIP 2 Issue Paper:

1. Develop procedures and tariff provisions for cost-benefit assessment of network upgrades.

Rank 0-3: 0

Comments:

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

Rank 0-3: 3

Comments:

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

Rank 0-3: 3

Comments:

4. Clarify applicability of GIP for a generator connecting to a non-PTO that is inside the ISO Balancing Area Authority (BAA) and wants to have full capacity deliverability status.

Rank 0-3: 3

Comments: This item needs to be addressed so that there is clarity around the procedure for granting deliverability status to generators inside the CAISO BAA but connected to a non-PTO facility at any voltage class. The process for granting deliverability status must explicitly address these generators so that projects in the BAA that are delivering power to the ISO are given the opportunity to receive credit for the capacity they provide. Since these projects were inadvertently excluded from the One-Time Full Capacity Deliverability Option in the previous GIP reform, they should be given the opportunity for a One-time deliverability study under the GIP II reforms.

5. Explore potential modifications to the triggers that establish the deadlines for IC financial security postings.

Rank 0-3: 3

Comments:

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

Rank 0-3: 3

Comments:

7. Clarify ISO information provision to assist ICs.

Rank 0-3:

Comments:

8. Consider partial capacity as an interconnection deliverability status option.

Rank 0-3:

Comments:

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

Rank 0-3: 3

Comments:

10. Provide for partial repayment of IC funding of network upgrades upon completion and commercial operation of each phase of a phased project.

Rank 0-3: 3

Comments:

11. Applying Section 25 of the tariff to conversions of grandfathered generating units to compliance with ISO tariff.

Rank 0-3: 0

Comments:

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

Rank 0-3:

Comments:

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

Rank 0-3:

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.

Rank 0-3:

Comments:

15. Clarify posting requirements for an IC that is already in operation and is applying only to increase its MW capacity.

Rank 0-3: 0

Comments:

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

Rank 0-3:

Comments:

17. Clarify how GIP applies to storage facilities and behind-the-meter expansion of existing facilities.

Rank 0-3:

Comments:

18. Conform technical requirements for small and large generators to a single standard, and develop study methodology to determine voltage impacts pursuant to FERC's 2010 order on ISO's proposed new interconnection standards.

Rank 0-3:

Comments:

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

Rank 0-3: 3

Comments:

20. Include operational impacts in assessing generation interconnection impacts.

Rank 0-3: 0

Comments:

21. Revise provisions for transferring queue position to a new IC.

Rank 0-3: 0

Comments:

Other Comments:

1. Are the five workgroups and their topic areas organized properly?
2. Are there other topics that you believe should be considered for the scope of GIP 2?
3. If you have other comments, please provide them here.

Invenergy generally concurs with the comments provided by CalWEA regarding the issues on which we made no comments.