

Stakeholder Comments Template

Subject: Generator Interconnection Procedures Straw Proposal and Meeting

Submitted by	Company	Date Submitted
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This template was created to help stakeholders submit written comments on topics related to the May 26, 2010 Generator Interconnection Procedures Straw Proposal and June 3, 2010 Generator Interconnection Procedures Stakeholder Meeting. Please submit comments and thoughts (in MS Word) to dkirrene@caiso.com no later than the close of business on June 21, 2010.

Please add your comments where indicated responding to the questing raised. Your comments on any other aspect of the proposal are also welcome. The comments received will assist the ISO with the development of the Draft Final Proposal.

Proposed Independent Study Process

1. Do you think that the proposed independent study process criteria are appropriate?
The criteria for the proposed independent study process don't seem practical and would be difficult to evaluate. An independent study should be based solely on the technical feasibility of projects (6.1.b.) and site control (6.1.f.). This would be similar to the current 'fast track' type evaluation for projects up to 2MW but with different criteria and for projects between 2-20MW. This would preserve the intent of the SGIP serial process of connecting projects quickly that can fit on the existing system without network upgrades and provide incentive for developers being first to propose a project in a given area. If significant upgrades are required to connect a project in an area than that project can move to the cluster process and share the upgrade costs with other projects.
2. How should the proposed independent study process be specifically modified to incorporate desired features that are in the current SGIP serial process?
3. How can the independent study criteria be modified to allow PTOs to utilize this process if they do not have a backlog and waiting for the cluster window does not make sense?
4. What pre-application information and guidance is needed to prequalify projects so that the process is not overwhelmed with applications?

5. How much "ISO and PTO judgment" should be allowed in qualifying projects and how should it be delineated? [Propose technical and electrical requirements that are simple to measure and not subjective. Project development criteria should not be evaluated in this process as this is independent of the electrical requirements.](#)
6. What would be sufficient transparency into the ISO and PTO judgment process in qualifying projects and how would that be provided?
7. If the proposed independent study process is included in the final proposal, is there still a need for the current LGIP Phase II accelerated study process? (CAISO Tariff Appendix Y Section 7.6)

Proposed Study Deposit Amounts

Are the proposed study deposit amounts appropriate, if not please explain?

[Study deposits should be based on a \\$/MW to incentivize developers to size their projects according to system limitations and project strategy. Suggest \\$5k/MW for full deliverability and \\$2.5k/MW for energy only with no cap.](#)

Proposed Cluster Study Process

Do the proposed timelines for the cluster study process seem reasonable? Please add explanations for both yes or no responses?

Coordinating generator interconnections with the transmission planning process

Do you support the concept of coordinating the proposed generator interconnection process with the transmission planning process, why or why not?

Deliverability Assessments

1. What are your thoughts on the proposed alternatives for deliverability assessments?
2. What adjustments should be made to each alternative?

Proposed Transition Plan

1. Do you think that the proposed transition plan is reasonable for LGIP projects?
2. Do you think that the proposed transition plan is reasonable for SGIP projects?
3. Do you have any comments on the proposed dates for grandfathering projects in queue and migration of new projects and in queue projects into the proposed cluster process?

[Current projects that meet the technical and electrical independence requirements in the independent study process should be allowed to continue on in the serial process and not wait for the cluster.](#)

[Suggest limiting the transition cluster projects to for applications received between dates of GIP Straw Proposal posting and FERC filing.](#)

Do you have any additional comments that you would like to provide?

Section 8 of the Straw Proposal regarding data availability: redacted ISO and WDAT studies should be posted on the web within a certain time period after completion (see Pacificorp online queue). Recorded minutes from scoping meetings should also be posted to the web. This will help developers to understand the availability of the transmission/distribution system and limit the number of applications received with little extra time required by the ISO and utility.