

FOR DISCUSSION PURPOSES ONLY

LSA COMMENTS ON DRAFT TARIFF LANGUAGE FOR IPE TOPICS 6-12

LSA's detailed comments are shown in **green highlight** below, for the convenience of the reader. Major overall points are as follows, consistent with LSA's prior written comments:

- **Suspension rights:** LSA strongly objects to applying the changes in project-suspension rights (IPT Topic 12) to LGIA amendments (to agreements using Appendices V or BB), especially where the amendments are needed as a result of factors beyond the IC's control (e.g., COD delays due to PTO RNU delays) or are not material (i.e., do not adversely impact any lower-queued projects). LSA also notes that this language would have to be changed to address the Wellhead proposal on shared upgrades, if it is refined and accepted by the CAISO.
- **Material Modification Assessment (MMA) study deposit:** LSA understood the CAISO's statements on the last stakeholder Webcast to say that, if a project is still in the interconnection-study process, the \$10K deposit would be assumed to be covered by the initial Study Deposit funds, i.e., a separate deposit would not be needed. This made sense, since the CAISO has not been able to provide information during the interconnection-study process on the amount of funds expended to date.

However, this draft tariff language requires a \$10K deposit "to the extent that the CAISO is still holding at least \$10,000 in study funds that have not already been encumbered." How will the CAISO and the IC know the amount of funds that "have not already been encumbered?"

- **Self-prioritization for draft GIA issuance:** As noted in LSA's written comments, LSA believes that the CAISO should provide tariff language allowing ICs to elect issuance of a draft GIA keyed to the timing of the interconnection study completion (current timeline) instead of to the Results Meeting, if that election is made within the timing allowed for other post-Phase I Study changes. LSA agrees that other self-prioritization measures can be addressed in the BPM process.

11. CAISO Settlements And Billing

* * *

~~11.12.3.2 — Process Fee~~

~~A fee to defray the costs of processing the Participating Intermittent Resource Export Fee will be levied as specified in Schedule 4 of Appendix F.~~

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

* * *

25.1.2 Affidavit Requirement

If the owner of a Generating Unit described in Section 25.1(d), or its designee, represents that the total generating capability and electrical characteristics of the Generating Unit will be substantially unchanged from the previously approved generating capability, then that entity must submit an affidavit to the CAISO and the applicable Participating TO representing that the total generating capability and electrical characteristics of the Generating Unit will have remained substantially unchanged. However, if there is any change to the total generating capability and electrical characteristics of the Generating Unit, however, the affidavit shall include supporting information describing any such changes. The CAISO and the applicable Participating TO shall have the right to verify whether or not the total generating capability or electrical characteristics of the Generating Unit have substantially changed or will substantially change. The CAISO may, at its option, engage the services of the applicable Participating TO in the CAISO's conducting such verification activities, in which case the such costs shall be borne by the party making the request under Section 25.1.2, and such costs shall be included in any CAISO invoice for verification activities.

Comment [SS1]: This could be a problem, since documentation from many years ago is sometimes spotty, on both sides. This seems like a substantive change and not a "clarification."

* * *

Appendix S Small Generator Interconnection Procedures

* * *

1.3.3 Interconnection Request

The Interconnection Customer shall submit its Interconnection Request to the CAISO, together with the processing fee or deposit specified in the Interconnection Request. The Interconnection Request shall be date- and time-stamped upon receipt. The original date and time stamp applied to the Interconnection Request at the time of its original submission shall be accepted as the qualifying date- and time-stamp for the purposes of any timetable in these procedures. The Interconnection Customer shall be notified of receipt by the CAISO within three (3) Business Days of receiving the Interconnection Request. The CAISO shall notify the Interconnection Customer within ten (10) Business Days of the receipt of the Interconnection Request as to whether the Interconnection Request is complete or incomplete. If the Interconnection Request is incomplete, the CAISO shall provide a notice that the Interconnection Request is incomplete, along with a written list detailing all information that must be provided to complete the Interconnection Request. The Interconnection Customer will have ten (10) Business Days after receipt of the notice to submit the listed information or to request an extension of time to provide such information. If the Interconnection Customer does not provide the listed information or a request for an extension of time within the deadline, the Interconnection Request will

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

be deemed withdrawn. An Interconnection Request will be deemed complete upon submission of the listed information to the CAISO.

The expected In-Service Date of the new Small Generating Facility shall not exceed seven years from the date the Interconnection Request is received by the CAISO, unless the Interconnection Customer demonstrates that engineering, permitting and construction of the new Small Generating Facility or increase in capacity of the existing Generating Facility will take longer. The In-Service Date may exceed the date the Interconnection Request is received by the CAISO by a period up to ten years, or longer where the Interconnection Customer, the applicable Participating TO and the CAISO agree, such agreement not to be unreasonably withheld.

Formatted: Highlight

Formatted: Indent: Left: 1"

Comment [SS2]: Should be 10 years, - serial SGIP projects are supposed to be treated like serial LGIP projects, i.e., have 10 years. (The 7 years is supposed to apply for cluster-study projects.) Also, this raises a problem for any projects already in the queue for a period close enough to the limit that they cannot complete their projects by the new deadline - raises retroactive change issues.

1.3.4 Modification of the Interconnection Request

The Interconnection Customer shall submit to the CAISO, in writing, modifications to any information provided in the Interconnection Request. The Interconnection Customer shall retain its Queue Position if the modifications are determined not to be Material Modifications pursuant to SGIP Section 1.3.4.1. Notwithstanding the above, during the course of the Interconnection Studies, the Interconnection Customer, the applicable Participating TO(s), or the CAISO may identify changes to the planned interconnection that may improve the costs and benefits (including reliability) of the interconnection, and the ability of the proposed change to accommodate the Interconnection Request. To the extent the identified changes are acceptable to the applicable Participating TO(s), the CAISO, and Interconnection Customer, such acceptance not to be unreasonably withheld, the CAISO shall modify the Point of Interconnection and/or configuration in accordance with such changes and the Interconnection Customer shall retain its Queue Position. Any modification to machine data or equipment configuration, or to the interconnection site of the Small Generating Facility not agreed to in writing by the CAISO and the Interconnection Customer may be deemed a withdrawal of the Interconnection Request and may require submission of a new Interconnection Request, unless proper notification of each Party by the other and a reasonable time to cure the problems created by the changes are undertaken.

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

1.3.4.1 Prior to making any modification, the Interconnection Customer must first request that the CAISO evaluate whether such modification is a Material Modification. In response to the Interconnection Customer's request, the CAISO, in coordination with the affected Participating TO, shall evaluate the proposed modifications and the CAISO shall inform the Interconnection Customer in writing of whether the modifications would constitute a Material Modification. The CAISO may engage the services of the applicable Participating TO to assess the modification, in which case costs for both the Participating TO and CAISO shall be borne by the party making the request under Section 1.3.4, and such costs shall be included in any CAISO invoice for modification assessment activities. Any change to the Point of Interconnection, except those deemed acceptable under SGIP Section 1.3.4 or so allowed elsewhere, shall constitute a Material Modification. The Interconnection Customer may then withdraw the proposed modification or proceed with a new Interconnection Request for such modification.

Formatted: Highlight

Formatted: Indent: Left: 1"

1.3.4.2 The Interconnection Customer shall provide the CAISO a \$10,000 deposit for the modification assessment at the time the request is submitted. Alternatively, the Interconnection Customer may elect to use existing study funds to the extent that the CAISO is still holding at least \$10,000 in study funds that have not already been encumbered. Except as provided below, any modification assessment will be concluded, and a response provided to the Interconnection Customer in writing, within forty-five (45) calendar days from the date the CAISO receives all of the following: the Interconnection Customer's written notice to modify the project, technical data required to assess the

Formatted: Font: (Default) Arial, 10 pt, Highlight

Formatted: Highlight

Comment [SS3]: As discussed in the stakeholder process, how will the IC know if any funds are not "encumbered" when the CAISO generally does not provide any study-cost information until well after the Phase II Study process? What does "encumbered" mean in this context?

Formatted: Highlight

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

request and payment of the \$10,000 deposit. If the modification assessment cannot be completed within that time period, the CAISO shall notify the Interconnection Customer and provide an estimated completion date with an explanation of the reasons why additional time is required. The Interconnection Customer will be responsible for the actual costs incurred by the CAISO and applicable Participating TO(s) in conducting the modification assessment. If the actual costs of the modification assessment are less than the deposit provided by the Interconnection Customer, the Interconnection Customer will be refunded the balance. If the actual costs of the modification assessment are greater than the deposit provided by the Interconnection Customer, the Interconnection Customer shall pay the balance when invoiced. The CAISO shall coordinate the modification request results with the Participating TO(s).

- 2.3.2 If the Company does not schedule an inspection of the Small Generating Facility within ten business days after receiving the Certificate of Completion, the witness test is deemed waived (unless the Parties agree otherwise); or

Appendix T

Small Generator Interconnection Agreement

3.4.5 Modification of the Small Generating Facility

Prior to making any modification to the Small Generating Facility, the Interconnection Customer must first request that the CAISO evaluate whether any such proposed modification is a Material Modification and receive written authorization from the Participating TO and the CAISO before making any change to the Small Generating Facility that may have a material impact on the safety or reliability of the CAISO Controlled Grid or the Participating TO's electric system. Such authorization shall not be unreasonably withheld. The CAISO may engage the services of the applicable Participating TO in the CAISO's conducting any such modification assessment, in which case costs for both the Participating TO and CAISO shall be borne by the party making the request under Section 1.3.4 of Appendix S, and such costs shall be included in any CAISO invoice for modification assessment activities. Modifications shall be done in accordance with Good Utility Practice. If the Interconnection Customer makes such modification without the Participating TO's and the CAISO's prior written authorization, the Participating TO or the CAISO shall have the right to temporarily disconnect the Small Generating Facility. Any change to the Point of Interconnection, except those deemed acceptable under this article of the SGIA or so allowed elsewhere, shall constitute a Material Modification. The Interconnection Customer may then withdraw the proposed modification or proceed with a new Interconnection Request for such modification.

Appendix U

Standard Large Generator
Interconnection Procedures (LGIP)

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

Comment [SS4]: What about the CAISO's commitment to publish cost data? Should be in the tariff

Formatted: Highlight

FOR DISCUSSION PURPOSES ONLY

4.4.3

Prior to making any modification other than those specifically permitted by LGIP Sections 4.4.1, 4.4.2, and 4.4.5, the Interconnection Customer may must first request that the CAISO evaluate whether such modification is a Material Modification. In response to the Interconnection Customer's request, the CAISO, in coordination with the affected Participating TO, shall evaluate the proposed modifications prior to making them and the CAISO shall inform the Interconnection Customer in writing of whether the modifications would constitute a Material Modification. The CAISO may engage the services of the applicable Participating TO to assess the modification, in which case costs for both the Participating TO and CAISO shall be borne by the party making the request under Section 5.1, and such costs shall be included in any CAISO invoice for modification assessment activities. Any change to the Point of Interconnection, except those deemed acceptable under LGIP Sections 4.4.1, 6.1, 7.2 or so allowed elsewhere, shall constitute a Material Modification. The Interconnection Customer may then withdraw the proposed modification or proceed with a new Interconnection Request for such modification.

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

4.4.6

The Interconnection Customer shall provide the CAISO a \$10,000 deposit for the modification assessment at the time the request is submitted. Alternatively, the Interconnection Customer may elect to use existing study funds to the extent that the CAISO is still holding at least \$10,000 in study funds that have not already been encumbered. Except as provided below, any modification assessment will be concluded, and a response provided to the Interconnection Customer in writing, within forty-five (45) calendar days from the date the CAISO receives all of the following: the Interconnection Customer's written notice to modify the project, technical data required to assess the request and payment of the \$10,000 deposit. If the modification assessment cannot be completed within that time period, the CAISO shall notify the Interconnection Customer and provide an estimated completion date with an explanation of the reasons why additional time is required. The Interconnection Customer will be responsible for the actual costs incurred by the CAISO and applicable Participating TO(s) in conducting the modification assessment. If the actual costs of the modification assessment are less than the deposit provided by the Interconnection Customer, the Interconnection Customer will be refunded the balance. If the actual costs of the modification assessment are greater than the deposit provided by the Interconnection Customer, the Interconnection Customer shall pay the balance when invoiced. The CAISO shall coordinate the modification request results with the Participating TO(s).

Formatted: Highlight

Formatted: Indent: Left: 0", Hanging: 1"

Comment [SS5]: See above – IC needs to know how much of its prior Study Deposit money is not "encumbered." What does this mean, and how will the CAISO communicate this information?

Formatted: Highlight

5.2 Change In CAISO Operational Control

If the CAISO no longer has control of the portion of the CAISO Controlled Grid at the Point of Interconnection during the period when an Interconnection Request is pending, the CAISO shall transfer to applicable Participating TO which has ownership of the Point of Interconnection any amount of the deposit or payment with interest thereon that exceeds the cost that it incurred to evaluate the request for interconnection. Any difference between such net deposit amount and the costs that the successor Participating TO incurs to evaluate the request for interconnection shall be paid by or refunded to the Interconnection Customer, as appropriate. The CAISO shall coordinate with the applicable Participating TO which has ownership of the Point of Interconnection to complete any Interconnection Study, as appropriate, that the CAISO has begun but has not completed. If the CAISO Participating TO has tendered a draft LGIA to the Interconnection Customer but the Interconnection Customer has neither executed the

Formatted: Highlight

Formatted: Highlight

Interconnection Process Enhancements are highlighted yellow. Language currently pending on compliance with FERC is shaded grey. All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

LGIA or requested the filing of an unexecuted LGIA with FERC, unless otherwise provided, the Interconnection Customer must complete negotiations with the applicable Participating TO which has the ownership of the Point of Interconnection.

11.1 Tender

11.1.1

The applicable Participating TO(s) shall tender a draft LGIA, together with draft appendices: (1) Within thirty (30) Calendar Days after the Interconnection Customer has its Results Meeting to discuss CAISO receives the Interconnection Customer's written comments, or notification of no comments, to the draft Interconnection Facilities Study report, or (2) if the Interconnection Customer elects expedited treatment in the Facility Study Agreement, within thirty (30) Calendar Days after the CAISO receives the Interconnection Customer's written comments, or notification of no comments, the applicable Participating TO(s) and the CAISO shall tender a draft LGIA, together with draft appendices. The draft LGIA shall be in the form of the FERC-approved standard form LGIA set forth in CAISO Tariff Appendix V. The Interconnection Customer shall provide written comments, or notification of no comments, to the draft appendices to the applicable Participating TO(s) and the CAISO within (30) calendar days of receipt.

- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Comment [SS6]: Consistent with the concept of self-prioritization. As LSA indicated earlier, LSA favors addressing this element of self-prioritization in the tariff and not in the BPMs, so the tariff and BPM provisions do not contradict each other.
- Formatted: Highlight

11.2 Negotiation

Notwithstanding LGIP Section 11.1, at the request of the Interconnection Customer, the applicable Participating TO(s) and CAISO shall begin negotiations with the Interconnection Customer concerning the appendices to the LGIA at any time after the Interconnection Customer executes the Interconnection Facilities Study Agreement. The applicable Participating TO(s) and CAISO and the Interconnection Customer shall negotiate concerning any disputed provisions of the appendices to the draft LGIA for not more than sixty (60) calendar days after tender of the final Interconnection Facilities Study report. If the Interconnection Customer determines that negotiations are at an impasse, it may request termination of the negotiations at any time after tender of the draft LGIA pursuant to LGIP Section 11.1 and request submission of the unexecuted LGIA with FERC or initiate Dispute Resolution procedures pursuant to LGIP Section 13.5. If the Interconnection Customer requests termination of the negotiations, but within ninety (90) calendar days after issuance of the final Interconnection Facilities Study report fails to request either the filing of the unexecuted LGIA or initiate Dispute Resolution, it shall be deemed to have withdrawn its Interconnection Request. Unless otherwise agreed by the Parties, if the Interconnection Customer has not executed and returned the LGIA, requested filing of an unexecuted LGIA, or initiated Dispute Resolution procedures pursuant to LGIP Section 13.5 within ninety (90) calendar days after issuance of the final Interconnection Facilities Study report, it shall be deemed to have withdrawn its Interconnection Request. The applicable Participating TO(s) and CAISO shall provide to the Interconnection Customer a final LGIA within fifteen ten (1510) Business Days after the completion of the negotiation process and receipt of all requested information.

- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight

Appendix V

Standard Large Generator Interconnection Agreement

Interconnection Process Enhancements are highlighted yellow. Language currently pending on compliance with FERC is shaded grey. All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

5.16 Suspension. The Interconnection Customer reserves the right, upon written notice to the Participating TO and the CAISO, to suspend at any time all work associated with the construction and installation of the Participating TO's Interconnection Facilities, Network Upgrades, and/or Distribution Upgrades required under this LGIA, **other than Network Upgrades identified in the Phase II Interconnection Study as common to multiple Generating Facilities,** in all circumstances other than an amendment to an agreement executed prior to implementation of the shared-Network Upgrade exception, with the condition that the Participating TO's electrical system and the CAISO Controlled Grid shall be left in a safe and reliable condition in accordance with Good Utility Practice and the Participating TO's safety and reliability criteria and the CAISO's Applicable Reliability Standards. In such event, the Interconnection Customer shall be responsible for all reasonable and necessary costs which the Participating TO (i) has incurred pursuant to this LGIA prior to the suspension and (ii) incurs in suspending such work, including any costs incurred to perform such work as may be necessary to ensure the safety of persons and property and the integrity of the Participating TO's electric system during such suspension and, if applicable, any costs incurred in connection with the cancellation or suspension of material, equipment and labor contracts which the Participating TO cannot reasonably avoid; provided, however, that prior to canceling or suspending any such material, equipment or labor contract, the Participating TO shall obtain Interconnection Customer's authorization to do so.

The Participating TO shall invoice the Interconnection Customer for such costs pursuant to Article 12 and shall use due diligence to minimize its costs. In the event Interconnection Customer suspends work required under this LGIA pursuant to this Article 5.16, and has not requested the Participating TO to recommence the work or has not itself recommenced work required under this LGIA on or before the expiration of three (3) years following commencement of such suspension, this LGIA shall be deemed terminated. The three-year period shall begin on the date the suspension is requested, or the date of the written notice to the Participating TO and the CAISO, if no effective date is specified.

* * *

5.17.3 Indemnification for the Cost Consequence of Current Tax Liability Imposed Upon the Participating TO. Notwithstanding Article 5.17.1, the Interconnection Customer shall protect, indemnify and hold harmless the Participating TO from the cost consequences of any current tax liability imposed against the Participating TO as the result of payments or property transfers made by the Interconnection Customer to the Participating TO under this LGIA for Interconnection Facilities, as well as any interest and penalties, other than interest and penalties attributable to any delay caused by the Participating TO.

The Participating TO shall not include a gross-up for the cost consequences of any current tax liability in the amounts it charges the Interconnection Customer under this LGIA unless (i) the Participating TO has determined, in good faith, that the payments or property transfers made by the Interconnection Customer to the Participating TO should be reported as income subject to taxation or (ii) any Governmental Authority directs the Participating TO to report payments or property as income subject to taxation; provided, however, that the Participating TO may require the Interconnection Customer to provide security for Interconnection Facilities, in a form reasonably acceptable to the Participating TO (such as a parental guarantee or a letter of credit), in an amount equal to the cost consequences of any current tax liability under this Article 5.17. The Interconnection Customer shall reimburse the Participating TO for such costs on a fully grossed-up basis, in accordance with Article 5.17.4, within thirty (30) Calendar Days of receiving written notification from the Participating TO of the amount due, including detail about how the amount was calculated.

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

Comment [SS7]: Would need to be modified to reflect the Wellhead proposal, if the CAISO proceeds with it.

Comment [SS8]: As noted above and in LSA's prior written comments, LSA strongly objects to imposing the shared-NU exception to suspension rights, especially where the amendment is needed for reasons beyond the IC's control or is not material.

FOR DISCUSSION PURPOSES ONLY

The indemnification obligation shall terminate at the earlier of (1) the expiration of the ten year testing period and the applicable statute of limitation, as it may be extended by the Participating TO upon request of the IRS, to keep these years open for audit or adjustment, or (2) the occurrence of a subsequent taxable event and the payment of any related indemnification obligations as contemplated by this Article 5.17.

* * *

Appendix Y GIP For Interconnection Requests Generator Interconnection Procedures (GIP)

* * *

3.5.1.1 Use of Interconnection Study Deposit.

The CAISO shall deposit all Interconnection Study Deposits in an interest bearing account at a bank or financial institution designated by the CAISO. The Interconnection Study Deposit shall be applied to pay for prudent costs incurred by the CAISO, the Participating TOs, or third parties at the direction of the CAISO or Participating TOs, as applicable, to perform and administer the Interconnection Studies and to meet and otherwise communicate with Interconnection Customers with respect to their Interconnection Requests.

Except for proposed Generating Facilities processed under the Fast Track Process set forth in Section 5 of this GIP, the Interconnection Study Deposits shall be refundable as follows:

- (a) Should an Interconnection Request be withdrawn by the Interconnection Customer or be deemed withdrawn by the CAISO by written notice under GIP Section 3.8 on or before thirty (30) calendar days following the Scoping Meeting, the CAISO shall refund to the Interconnection Customer any portion of the Interconnection Customer's Interconnection Study Deposit, including interest earned at the rate provided for in the interest-bearing account from the date of deposit to the date of withdrawal, that exceed the costs the CAISO, Participating TOs, and third parties have incurred on the Interconnection Customer's behalf.
- (b) Should an Interconnection Request made under GIP Section 3.5.1 be withdrawn by the Interconnection Customer or be deemed withdrawn by the CAISO by written notice under GIP Section 3.8 more than thirty (30) calendar days after the Scoping Meeting, but on or before thirty (30) calendar days following the Results Meeting (or the latest date permitted under this GIP for a Results Meeting if a customer elects not to have a Results Meeting) for the Phase I Interconnection Study or the System Impact Study for Generating Facilities processed under the Independent Study Process, the CAISO shall refund to the Interconnection Customer the difference between (i) the Interconnection Customer's Interconnection Study Deposit and (ii) the greater of the costs the CAISO and Participating TOs have incurred on the Interconnection Customer's behalf or one-half of the original Interconnection Study Deposit up to a maximum of \$100,000, including interest earned at the rate provided for in the interest-bearing account from the date of deposit to the date of withdrawal.

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

- (c) Should an Interconnection Request be withdrawn by the Interconnection Customer or be deemed withdrawn by the CAISO by written notice under GIP Section 3.8 at any time more than thirty (30) calendar days after the Results Meeting (or the latest date permitted under this GIP for a Results Meeting if a customer elects not to have a Results Meeting) for the Phase I Interconnection Study, or the System Impact Study for proposed Generating Facilities processed under the Independent Study Process, the Interconnection Study Deposit shall be non-refundable.
- (d) Upon execution of a GIA by an Interconnection Customer, the CAISO and the applicable Participating TOs, or the approval by FERC of an unexecuted GIA, the CAISO shall refund to the Interconnection Customer any portion of the Interconnection Customer's Interconnection Study Deposit, including interest earned at the rate provided for in the interest-bearing account from the date of deposit to the date of withdrawal, that exceeds the costs the CAISO, Participating TOs, and third parties have incurred on the Interconnection Customer's behalf.

Notwithstanding the foregoing, an Interconnection Customer that withdraws or is deemed to have withdrawn its Interconnection Request during an Interconnection Study Cycle shall be obligated to pay to the CAISO all costs in excess of the Interconnection Study Deposit that have been prudently incurred or irrevocably have been committed to be incurred with respect to that Interconnection Request prior to withdrawal. The CAISO will reimburse the applicable Participating TO(s) or third parties, as applicable, for all work performed on behalf of the withdrawn Interconnection Request at the CAISO's direction. The Interconnection Customer must pay all monies due before it is allowed to obtain any Interconnection Study data or results.

All non-refundable portions of the Interconnection Study Deposit that exceed the costs the CAISO, Participating TOs, or third parties [engaged by the CAISO or Participating TOs](#) have incurred on the Interconnection Customer's behalf shall be treated in accordance with CAISO Tariff Section 37.9.4. [In addition, any funds received by the CAISO from a Participating TO, pursuant to a requirement in the Participating TO's wholesale distribution tariff for funds to be distributed by the CAISO, shall be treated in accordance with CAISO Tariff Section 37.9.4.](#)

Comment [SS9]: Clarification.

6.9.2.2

At the Phase I Interconnection Study Results Meeting, the Interconnection Customer should be prepared to discuss any desired modifications to the Interconnection Request. After the issuance of the final Phase I Interconnection Study, but no later than five (5) Business Days following the Phase I Interconnection Study Results Meeting, the Interconnection Customer shall submit to the CAISO, in writing, modifications to any information provided in the Interconnection Request. The CAISO will forward the Interconnection Customer's modification to the applicable Participating TO(s) within one (1) Business Day of receipt.

Modifications permitted under this Section 6.9.2 shall include specifically: (a) a decrease in the electrical output (MW) of the proposed project; (b) modifying the technical parameters associated with the Generating Facility technology or the Generating Facility step-up transformer impedance characteristics; and (c) modifying the interconnection configuration.

For any modification other than these, the Interconnection Customer [may must](#) first request that the CAISO evaluate whether such modification is a Material Modification. In response to the Interconnection Customer's request, the CAISO, in coordination with the

Formatted: Highlight

Formatted: Highlight

Interconnection Process Enhancements are highlighted [yellow](#).
Language currently pending on compliance with FERC is shaded [grey](#).
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

affected Participating TO(s) and, if applicable, any Affected System Operator, shall evaluate the proposed modifications prior to making them and the CAISO shall inform the Interconnection Customer in writing of whether the modifications would constitute a Material Modification. **The CAISO may engage the services of the applicable Participating TO to assess the modification, in which case costs for both the Participating TO and CAISO shall be borne by the party making the request under Section 6.9.2, and such costs shall be included in any CAISO invoice for modification assessment activities.** Any change to the Point of Interconnection, except for that specified by the CAISO in an Interconnection Study or otherwise allowed under this GIP Section 6.9.2, shall constitute a Material Modification. The Interconnection Customer may then withdraw the proposed modification or proceed with a new Interconnection Request for such modification.

Formatted: Highlight

The Interconnection Customer shall remain eligible for the Phase II Interconnection Study if the modifications are in accordance with this GIP Section 6.9.2.

6.9.2.3 The Interconnection Customer shall provide the CAISO a \$10,000 deposit for the modification assessment at the time the request is submitted. Alternatively, the Interconnection Customer may elect to use existing study funds to the extent that the CAISO is still holding at least \$10,000 in study funds that have not already been encumbered. Except as provided below, any modification assessment will be concluded, and a response provided to the Interconnection Customer in writing, within forty-five (45) calendar days from the date the CAISO receives all of the following: the Interconnection Customer's written notice to modify the project, technical data required to assess the request and payment of the \$10,000 deposit. If the modification assessment cannot be completed within that time period, the CAISO shall notify the Interconnection Customer and provide an estimated completion date with an explanation of the reasons why additional time is required. The Interconnection Customer will be responsible for the actual costs incurred by the CAISO and applicable Participating TO(s) in conducting the modification assessment. If the actual costs of the modification assessment are less than the deposit provided by the Interconnection Customer, the Interconnection Customer will be refunded the balance. If the actual costs of the modification assessment are greater than the deposit provided by the Interconnection Customer, the Interconnection Customer shall pay the balance when invoiced. The CAISO shall coordinate the modification request results with the Participating TO(s).

Formatted: Highlight

Formatted: Indent: Left: 1"

Comment [SS10]: See above – IC needs to know how much of its prior Study Deposit money is not "encumbered." What does this mean, and how will the CAISO communicate this information?

Formatted: Highlight

* * *

9.2.3 Posting Amount for Network Upgrades.

~~First~~, Each Interconnection Customer for a Small Generating Facility assigned to a Queue Cluster and ~~or~~ each Interconnection Customer for a Small Generating Facility in the Independent Study Process shall post an Interconnection Financial Security instrument in an amount equal to the lesser of fifteen percent (15%) of the total cost responsibility assigned to the Interconnection Customer in the final Phase I Interconnection Study or System Impact Study for Network Upgrades or (ii) \$20,000 per megawatt of electrical output of the Small Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request, including any requested modifications thereto, but in no event less than \$50,000.

Each ~~the~~ Interconnection Customer for a Large Generating Facility assigned to a Queue Cluster and each Interconnection Customer for a Large Generating Facility in the Independent Study Process shall post an Interconnection Financial Security instrument in an amount equal to the lesser of (i) fifteen percent (15%) of the total cost responsibility

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

assigned to the Interconnection Customer in the final Phase I Interconnection Study or System Impact Study for Network Upgrades, (ii) \$20,000 per megawatt of electrical output of the Large Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request, including any requested modifications thereto, or (iii) \$7,500,000, but in no event less than \$500,000.

Notwithstanding the foregoing, if the costs of the estimated Network Upgrades are less than the minimum posting amounts set forth above, the posting amount required will be equal to the estimated Network Upgrade amount.

In addition, if an Interconnection Customer switches its status from Full Capacity Deliverability Status to Energy-Only Deliverability Status within five (5) Business Days following the Phase I Interconnection Study Results Meeting, as permitted in Section 7.1 of this GIP, the required Interconnection Financial Security for Network Upgrades shall, for purposes of this section, be additionally capped at an amount no greater than the total cost responsibility assigned to the Interconnection Customer in the Phase I Interconnection Study for Reliability Network Upgrades.

~~The Interconnection Customer shall also post an Interconnection Financial Security.~~

9.2.4 Posting Amount for Participating TO's Interconnection Facilities.

9.2.4.1 For Small Generating Facilities. Each Interconnection Customer for a Small Generating Facility assigned to a Queue Cluster and each Interconnection Customer for a Small Generating Facility in the Independent Study Process shall post an Interconnection Financial Security instrument in an amount equal to the lesser of (i) fifteen (15) percent of the total cost responsibility assigned to the Interconnection Customer in the final Phase I Interconnection Study or System Impact Study for Participating TO's Interconnection Facilities or (ii) \$20,000 per megawatt of electrical output of the Small Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request, including any requested modifications thereto, but in no event less than \$50,000.

9.2.5 Consequences for Failure to Post. The failure by an Interconnection Customer to timely post the Interconnection Financial Security required by this GIP Section 9.2 shall result in the Interconnection Request being deemed withdrawn and subject to GIP Section 3.8. The Interconnection Customer shall provide the CAISO and the Participating TO with written notice that it has posted the required Interconnection Financial Security no later than the applicable final day for posting.

9.4.2.6 Notification to CAISO and Accounting by Applicable Participating TO(s).

The applicable Participating TO(s) shall notify the CAISO within one (1) Business Day of liquidating any Interconnection Financial Security. Within twenty (20) calendar days of any liquidating event, the applicable Participating TO(s) shall provide the CAISO and Interconnection Customer with an accounting of the disposition of the proceeds of the liquidated Interconnection Financial Security and remit to the CAISO all proceeds not otherwise reimbursed to the Interconnection Customer or applied to costs incurred or irrevocably committed by the applicable Participating TO(s) on behalf of the

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

Interconnection Customer in accordance with this GIP Section 9.4. All non-refundable portions of the Interconnection Financial Security remitted to the CAISO in accordance with this GIP Section 9.4 shall be treated in accordance with CAISO Tariff Section 37.9.4. In addition, any funds received by the CAISO from a Participating TO, pursuant to a requirement in the Participating TO's wholesale distribution tariff for funds to be distributed by the CAISO, shall be treated in accordance with CAISO Tariff Section 37.9.4.

11.1 Tender

11.1.1

The applicable Participating TO(s) shall tender a draft GIA, together with draft appendices. (1) Within thirty (30) Calendar Days after the CAISO provides Interconnection Customer has its Results Meeting to discuss the final Phase II Interconnection Study report, or the Facilities Study report (or System Impact Study report if the Facilities Study is waived) to the Interconnection Customer; or (2) if the Interconnection Customer elected expedited treatment pursuant to Section XXXX, within thirty (30) Calendar Days after the final Phase II Interconnection Study report, or the Facilities Study report (or System Impact Study report if the Facilities Study is waived) the applicable Participating TO(s) and the CAISO shall tender a draft GIA, together with draft appendices. The draft GIA shall be in the form of the FERC-approved form of GIA set forth in CAISO Tariff Appendix T or Appendix CC, as applicable. The Interconnection Customer shall provide written comments, or notification of no comments, to the draft appendices to the applicable Participating TO(s) and the CAISO within (30) calendar days of receipt.

Formatted: Highlight

Formatted: Highlight

Comment [SS11]: This should be the applicable section that addresses IC elections within 10 BDs of the Phase I Results Meeting.

Formatted: Font: Bold

Comment [SS12]: Consistent with the concept of self-prioritization. As LSA indicated earlier, LSA favors addressing this element of self-prioritization in the tariff and not in the BPMs, so the tariff and BPM provisions do not contradict each other.

Formatted: Highlight

Formatted: Highlight

11.1.2

Consistent with GIP Sections 13.3 and 11.1.1, when the transmission system of a Participating TO, in which the Point of Interconnection is not located, is affected, such Participating TO shall tender a separate agreement, in the form of the GIA, as appropriately modified.

11.2 Negotiation

Notwithstanding GIP Section 11.1, at the request of the Interconnection Customer, the applicable Participating TO(s) and CAISO shall begin negotiations with the Interconnection Customer concerning the appendices to the GIA at any time after the CAISO provides the Interconnection Customer with the final Phase II Interconnection Study report. The applicable Participating TO(s) and CAISO and the Interconnection Customer shall negotiate concerning any disputed provisions of the appendices to the draft GIA for not more than one hundred-twenty (120) calendar days after the CAISO provides the Interconnection Customer with the final Phase II Interconnection Study report, or the Facilities Study report (or System Impact Study report if the Facilities Study is waived). If the Interconnection Customer determines that negotiations are at an impasse, it may request termination of the negotiations at any time after tender of the draft GIA pursuant to GIP Section 11.1 and request submission of the unexecuted GIA with FERC or initiate Dispute Resolution procedures pursuant to GIP Section 13.5. If the Interconnection Customer requests termination of the negotiations, but, within one hundred twenty (120) calendar days after issuance of the final Phase II Interconnection Study report, fails to request either the filing of the unexecuted GIA or initiate Dispute Resolution, it shall be deemed to have withdrawn its Interconnection Request. Unless otherwise agreed by the Parties, if the Interconnection Customer has not executed and returned the GIA, requested filing of an unexecuted GIA, or initiated Dispute Resolution procedures pursuant to GIP Section 13.5 within one hundred-twenty (120) calendar days after issuance of the final Phase II Interconnection Study report, it shall be deemed to have withdrawn its Interconnection Request. The applicable Participating TO(s) and CAISO shall provide to the Interconnection Customer a final GIA within fifteen ten (1510) Business Days after the completion of the negotiation process and receipt of all requested information.

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Interconnection Process Enhancements are highlighted yellow. Language currently pending on compliance with FERC is shaded grey. All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

* * *

13.7 Change In CAISO Operational Control

If the CAISO no longer has control of the portion of the CAISO Controlled Grid at the Point of Interconnection during the period when an Interconnection Request is pending, the CAISO shall transfer to the applicable former Participating TO or successor entity which has ownership of the Point of Interconnection any amount of the deposit or payment with interest thereon that exceeds the cost that it incurred to evaluate the request for interconnection. Any difference between such net deposit amount and the costs that the former Participating TO or successor entity incurs to evaluate the request for interconnection shall be paid by or refunded to the Interconnection Customer, as appropriate. The CAISO shall coordinate with the applicable former Participating TO or successor entity which has ownership of the Point of Interconnection to complete any Interconnection Study, as appropriate, that the CAISO has begun but has not completed. If the CAISO Participating TO has tendered a draft GIA to the Interconnection Customer but the Interconnection Customer has neither executed the GIA nor requested the filing of an unexecuted GIA with FERC, unless otherwise provided, the Interconnection Customer must complete negotiations with the applicable former Participating TO or successor entity which has the ownership of the Point of Interconnection.

Formatted: Highlight

Formatted: Highlight

* * *

Appendix 8

Transition of Existing SGIP Interconnection Requests to the GIP

* * *

1.2.2 Special Definitions for this GIP Appendix 8

In this Appendix 8 to the GIP, the following words and expressions shall have the meanings set opposite them:

"SGIP Serial Study Group" shall mean those Interconnection Customers with valid Interconnection Requests submitted pursuant to Appendix S of the CAISO Tariff prior to December 18, 2010 and who have executed System Impact Study or Facilities Study Agreements that provide for the completion of such studies by December 18, 2010.

"SGIP Transition Cluster" shall mean those Interconnection Customers with valid Interconnection Requests submitted pursuant to Appendix S of the CAISO Tariff prior to December 18, 2010 and which have not executed System Impact Study or Facilities Study Agreements that provide for the completion of such studies by December 18, 2010.

Formatted: Indent: Left: 0"

2. Transition of Projects in SGIP Serial Study Group

Formatted: Indent: Left: 0"

2.1 An Interconnection Request deemed to be included in the SGIP Serial Study Group that wishes to be studied as an Energy-Only Deliverability Status Generating Facility shall not be required to conform to the provisions of Appendix Y of the CAISO Tariff. Rather, such Interconnection Requests will continue to be processed per the procedures set forth in Appendix S to the CAISO Tariff, unless they specifically indicate, in writing, within five (5) Business Days from the effective date of this Appendix 8 to the GIP, that they wish to be included in either the SGIP Transition Cluster, studied for Full Capacity Deliverability Status, or, if eligible, studied under the Independent Study Process set forth in Section 4 of Appendix Y.

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

3.4 At the conclusion of the Phase II Interconnection Study for the CAISO's first and second Queue Clusters, each Interconnection Customer remaining in the SGIP Transition Cluster shall receive a Phase II Interconnection Study report, which will indicate each Interconnection Customer's allocated share of costs for Interconnection Facilities and Reliability Network Upgrades. If the Interconnection Customer wishes to continue in the queue, the Interconnection Customer must sign and execute a Small Generator Interconnection Agreement within ninety (90) calendar days of receiving the final report and post the required Interconnection Financial Security as set forth in Section 9.3 of Appendix Y.

CAISO TARIFF APPENDIX BB

Standard Large Generator Interconnection Agreement

5.16 **Suspension.** The Interconnection Customer reserves the right, upon written notice to the Participating TO and the CAISO, to suspend at any time all work associated with the construction and installation of the Participating TO's Interconnection Facilities, Network Upgrades, and/or Distribution Upgrades required under this LGIA, other than Network Upgrades identified in the Phase II Interconnection Study as common to multiple Generating Facilities, in all circumstances other than an amendment to an agreement executed prior to implementation of the shared-Network Upgrade exception, with the condition that the Participating TO's electrical system and the CAISO Controlled Grid shall be left in a safe and reliable condition in accordance with Good Utility Practice and the Participating TO's safety and reliability criteria and the CAISO's Applicable Reliability Standards. In such event, the Interconnection Customer shall be responsible for all reasonable and necessary costs which the Participating TO (i) has incurred pursuant to this LGIA prior to the suspension and (ii) incurs in suspending such work, including any costs incurred to perform such work as may be necessary to ensure the safety of persons and property and the integrity of the Participating TO's electric system during such suspension and, if applicable, any costs incurred in connection with the cancellation or suspension of material, equipment and labor contracts which the Participating TO cannot reasonably avoid; provided, however, that prior to canceling or suspending any such material, equipment or labor contract, the Participating TO shall obtain Interconnection Customer's authorization to do so. The Participating TO shall invoice the Interconnection Customer for such costs pursuant to Article 12 and shall use due diligence to minimize its costs. In the event Interconnection Customer suspends work required under this LGIA pursuant to this Article 5.16, and has not requested the Participating TO to recommence the work or has not itself recommenced work required under this LGIA on or before the expiration of three (3) years following commencement of such suspension, this LGIA shall be deemed terminated. The three-year period shall begin on the date the suspension is requested, or the date of the written notice to the Participating TO and the CAISO, if no effective date is specified.

Formatted: Highlight
Comment [SS13]: Would have to be revised if the Wellhead concept is accepted.
Comment [SS14]: As noted above and in LSA's prior written comments, LSA strongly objects to imposing the shared-NU exception to suspension rights, especially where the amendment is needed for reasons beyond the IC's control or is not material.
Formatted: Highlight

Appendices to LGIA

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

Appendix A Interconnection Facilities, Network Upgrades and Distribution Upgrades

Appendix B Milestones

Appendix C Interconnection Details

Appendix D Security Arrangements Details

Appendix E Commercial Operation Date

Appendix F Addresses for Delivery of Notices and Billings

Appendix G [Not Used]

Appendix H Interconnection Requirements for an Wind-Asynchronous Generating Plant Facility

* * *

**Appendix H
To LGIA**

* * *

5. The requirements of this Section A.i of this Appendix H do not apply to faults that occur between the Asynchronous Generating Facility's terminals and the high side of the step-up transformer to the ~~the~~ high-voltage transmission system.

* * *

CAISO TARIFF APPENDIX CC

**Large Generator Interconnection Agreement
for Interconnection Requests in a Queue Cluster Window**

* * *

- 5.16 Suspension.** The Interconnection Customer reserves the right, upon written notice to the Participating TO and the CAISO, to suspend at any time all work associated with the construction and installation of the Participating TO's Interconnection Facilities, Network Upgrades, and/or Distribution Upgrades required under this LGIA, other than Network Upgrades identified in the Phase II Interconnection Study as common to multiple generating facilities, with the condition that the Participating TO's electrical system and the CAISO Controlled Grid shall be left in a safe and reliable condition in accordance with Good Utility Practice and the Participating TO's safety and reliability criteria and the CAISO's Applicable Reliability Standards. In such event, the Interconnection Customer shall be responsible for all reasonable and necessary costs which the Participating TO (i) has incurred pursuant to this LGIA prior to the suspension and (ii) incurs in suspending such work, including any costs incurred to perform such work as may be necessary to ensure the safety of persons and property and the integrity of the Participating TO's electric system during such suspension and, if applicable, any costs incurred in connection with the cancellation or suspension of material, equipment and labor contracts which the Participating TO

Comment [SS15]: Would have to be revised if the Wellhead concept is accepted.

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

cannot reasonably avoid; provided, however, that prior to canceling or suspending any such material, equipment or labor contract, the Participating TO shall obtain Interconnection Customer's authorization to do so.

Network Upgrades common to multiple generating facilities, and to which the Interconnection Customer's right of suspension shall not extend, consist of Network Upgrades identified for:

- (1) generating facilities which are the subject of all Interconnection Requests made prior to the Interconnection Customer's Interconnection Request;
- (2) generating facilities which are the subject of Interconnection Requests within the Interconnection Customer's queue cluster; and
- (3) generating facilities that are the subject of Interconnection Requests that were made after the Interconnection Customer's Interconnection Request but no later than the date on which the Interconnection Customer's Phase II Interconnection Study Report is issued, and have been modeled in the Base Case at the time the Interconnection Customer seeks to exercise its suspension rights under this Article.

The Participating TO shall invoice the Interconnection Customer for such costs pursuant to Article 12 and shall use due diligence to minimize its costs. In the event Interconnection Customer suspends work required under this LGIA pursuant to this Article 5.16, and has not requested the Participating TO to recommence the work or has not itself recommenced work required under this LGIA in time to ensure that the new projected Commercial Operation Date for the full Generating Facility Capacity of the Large Generating Facility is no more than three (3) years from the Commercial Operation Date identified in Appendix B hereto, this LGIA shall be deemed terminated and the Interconnection Customer's responsibility for costs will be determined in accordance with Article 2.4. The suspension period shall begin on the date the suspension is requested, or the date of the written notice to the Participating TO and the CAISO, if no effective date is specified.

* * *

ARTICLE 30. MISCELLANEOUS

* * *

Appendices to LGIA

Appendix A Interconnection Facilities, Network Upgrades and Distribution Upgrades

Appendix B Milestones

Appendix C Interconnection Details

Appendix D Security Arrangements Details

Appendix E Commercial Operation Date

Appendix F Addresses for Delivery of Notices and Billings

Appendix G Interconnection Customer's Proportional Share of Costs of Network Upgrades for Applicable Project Group

Appendix H Interconnection Requirements for an ~~Wind-Asynchronous~~ Generating ~~Plant~~Facility

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

Appendix DD

Generator Interconnection and Deliverability Allocation Procedures (GIDAP)

Table of Contents

1 OBJECTIVES AND APPLICABILITY

1.1 Objectives and Applicability

2 SCOPE AND APPLICATION

2.1 Application of Generator Interconnection Procedures

2.2 Comparability

2.3 Interconnection Base Case Data

2.4 Interconnection Service and Studies

2.4.1 No Applicability to Transmission Service

2.4.2 The Product

2.4.3 The Interconnection Studies

2.4.3.1 The Phase 1 Interconnection Studies

2.4.3.2 The Reassessment Prior to Phase II Interconnection Studies

2.4.3.3 The Phase II Interconnection Studies

2.4.3.4 Update Following TP Deliverability Allocation Process

3 INTERCONNECTION REQUESTS

3.1 General

3.2 Roles and Responsibilities

3.3 Timing for Submitting Interconnection Requests

3.3.1 Timing for Submitting Interconnection Requests for a Queue Cluster

3.3.2 Timing for Submitting Interconnection Requests for Independent Study Process and Fast Track Process

3.4 [NOT USED]

3.5 Processing of Interconnection Requests

3.5.1 Initiating an Interconnection Request

3.5.1.1 Use of Interconnection Study Deposit

3.5.1.2 Obligation for Study Costs

3.5.1.3 Use of Site Exclusivity Deposit

3.5.1.4 Proposed Commercial Operation Date

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

[3.5.2 Validation of Interconnection Request](#)

[3.5.2.1 Acknowledgment of Interconnection Request](#)

[3.5.2.2 Deficiencies in Interconnection Request](#)

[3.6 Internet Posting](#)

[3.7 Coordination with Affected Systems](#)

[3.8 Withdrawal](#)

[3.9 Transferability of Interconnection Request](#)

[4 INDEPENDENT STUDY PROCESS](#)

[4.1 Criteria for Independent Study Process Eligibility](#)

~~[4.1.1](#)~~

~~[4.1.2](#)~~

~~[4.1.3](#)~~

~~[4.1.4](#)~~

~~[4.1.5](#)~~

~~[4.1.6](#)~~

[4.2 Determination of Electrical Independence](#)

[4.2.1 Flow Impact Test](#)

[4.2.1.1 Requirement Set Number One General Independent Study Requests:](#)

[4.2.1.2 Requirement Set Number Two: for Requests for Independent Study of Behind-the-Meter Expansion](#)

[4.2.2 Short Circuit Test](#)

[4.3 Scoping Meeting](#)

[4.4 System Impact Study](#)

~~[4.4.1](#)~~

~~[4.4.2](#)~~

~~[4.4.3](#)~~

~~[4.4.4](#)~~

~~[4.4.5](#)~~

~~[4.4.6](#)~~

[4.5 Facilities Study](#)

~~[4.5.1](#)~~

~~[4.5.2](#)~~

~~[4.5.3](#)~~

~~[4.5.4](#)~~

~~[4.5.5](#)~~

[4.6 Deliverability Assessment](#)

[4.7 Extensions of Commercial Operation Date](#)

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

5 FAST TRACK PROCESS

5.1 Applicability and Initiation of Fast Track Process Request

5.2 Initial Review

5.3 Screens

5.3.1

5.3.1.1

5.3.1.2

5.3.1.3

5.3.1.4

5.3.1.5

5.3.1.6

5.4 Customer Options Meeting

5.4.1

5.4.2

5.4.3

5.5 Supplemental Review

5.5.1

5.5.1.1

5.5.1.2

5.5.1.3

5.5.2

6 INITIAL ACTIVITIES AND PHASE I OF THE INTERCONNECTION STUDY PROCESS FOR QUEUE CLUSTERS

6.1 Initial Activities Following the Close of the Cluster Application Window

6.1.1 Generator Interconnection Study Process Agreement

6.1.2 Scoping Meeting

6.1.3 Grouping Interconnection Requests

6.2 Scope and Purpose of Phase I Interconnection Study

6.3 Identification and Cost for Network Upgrades

6.3.1 Reliability Network Upgrades (RNUs)

6.3.2 Delivery Network Upgrades

6.3.2.1 The On-Peak Deliverability Assessment

6.3.2.1.1 Local Delivery Network Upgrades

6.3.2.1.2 Area Delivery Network Upgrades

6.3.2.1.3 [Intentionally Omitted]

6.3.2.2 Off-Peak Deliverability Assessment

6.4 Use of Per Unit Costs to Estimate Network Upgrade and PTO Interconnection Facilities Costs

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

Formatted: Tab stops: 0.5", Left + 1.52", Left

FOR DISCUSSION PURPOSES ONLY

6.5 [Intentionally Omitted]

6.6 Phase I Interconnection Study Procedures

6.7 Phase I Interconnection Study Results Meeting

6.7.1 Commercial Operation Date

6.7.2 Modifications

~~6.7.2.1~~

~~6.7.2.2~~

6.7.3 Determination of Impact of Modifications Decreasing Generating Capacity Output or Deliverability Status Reductions on Calculation of Initial Financial Security Posting

6.8 Revisions and Addenda to Final Interconnection Study Reports

6.8.1 Substantial Error or Omissions; Revised Study Report

6.8.2 Other Errors or Omissions; Addendum

6.8.3 Only Substantial Errors or Omissions Adjust Posting Dates

7 ACTIVITIES IN PREPARATION FOR PHASE II

7.1 Confirmation or Modification of Deliverability Status

7.2 Full/Partial Capacity Deliverability Options for Interconnection Customers

7.3 Postings and Cost Estimates for Network Upgrades

7.4 Reassessment Process

~~7.4.1~~

~~7.4.2~~

8 PHASE II INTERCONNECTION STUDY PROCESS

8.1 Scope of Phase II Interconnection Study

8.1.1 Purpose of the Phase II Interconnection Study

8.1.2 Interim Energy-Only Interconnection until DNU's Completed

8.1.3 Cost Estimation Detail

8.1.4 Operational Deliverability Assessment

8.2 Determining Phase II Network Upgrades

8.2.1 Reliability Network Upgrades and Local Delivery Network Upgrades

8.2.2 Area Delivery Network Upgrades

8.3 Cost Responsibility for Reliability Network Upgrades

8.4 Cost Responsibility for Local Delivery Network Upgrades

8.4.1 Cost Responsibility for Area Delivery Network Upgrades

8.5 Phase II Interconnection Study Procedures

8.6 Accelerated Phase II Interconnection Study Process

8.7 Results Meeting with the CAISO and Applicable PTO(s)

8.8 [Intentionally Omitted]

8.9 Allocation Process for TP Deliverability

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

[8.9.1 First Component: Representing TP Deliverability Used by Prior Commitments](#)

[8.9.2 Second Component: Allocating TP Deliverability to the Current Queue Cluster](#)

[8.9.3 Criteria for Retaining TP Deliverability Allocation](#)

[8.9.4 Parking for Option \(A\) Generating Facilities](#)

[8.9.5 Partial Allocations of Transmission Based Deliverability to Option \(A\) and Option \(B\)](#)

[Generating Facilities](#)

[8.9.6 Declining TP Deliverability Allocation](#)

[8.9.7 Consequences of Failure to Retain TP Deliverability](#)

[8.9.8 Updates to Phase II Interconnection Study Results](#)

[9 ADDITIONAL DELIVERABILITY ASSESSMENT OPTIONS](#)

[9.1 \[Intentionally Omitted\]](#)

[9.2 Annual Full Capacity Deliverability Option](#)

~~[9.2.1](#)~~

~~[9.2.2](#)~~

~~[9.2.3](#)~~

~~[9.2.4](#)~~

~~[9.2.4.1](#)~~

~~[9.2.4.2](#)~~

~~[9.2.4.3](#)~~

[9.3 PTO Tariff Option for Full Capacity Deliverability Status](#)

[9.4 Deliverability from Non-Participating TOs](#)

[10 Cost Responsibility For Interconnection Customers](#)

[10.1 Interconnection Customers in a Queue Cluster](#)

[10.2 Interconnection Customers in the Independent Study Process](#)

[11 INTERCONNECTION FINANCIAL SECURITY](#)

[11.1 Types of Interconnection Financial Security](#)

[11.2 Interconnection Financial Security-Initial Posting](#)

~~[11.2.1](#)~~

~~[11.2.2](#)~~

[11.2.3 Posting Amount for Network Upgrades](#)

[11.2.3.1 Small Generator Interconnection Customers](#)

[11.2.3.2 Large Generator Interconnection Customers](#)

[11.2.4 Posting Amount for Participating TO Interconnection Facilities](#)

[11.2.4.1 Small Generator Interconnection Customers](#)

[11.2.4.2 Large Generator Interconnection Customers](#)

[11.2.5 Cost Estimates Less than Minimum Posting Amounts](#)

[11.2.6 Consequences for Failure to Post](#)

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

11.2.7 Effect of Decrease in Output on Initial Posting Requirement

11.3. Interconnection Financial Security-Second and Third Postings

11.3.1 Second Posting

~~11.3.1.1~~

11.3.1.2 Timing of Posting

11.3.1.3 Posting Requirements and Timing for Parked Option (A) Generating Facilities

11.3.1.4 Network Upgrade Posting Amounts

11.3.1.4.1 Small Generator Interconnection Customers

11.3.1.4.2 Large Generator Interconnection Customers

11.3.1.4.3 Cost Estimates Less than Minimum Posting Amounts

11.3.1.5 Posting Amount for Participating TO Interconnection Facilities

11.3.1.5.1 Small Generator Interconnection Customers

11.3.1.5.2 Large Generator Interconnection Customers

11.3.1.5.3 Cost Estimates Less than Minimum Posting Amounts

11.3.1.6 Early Commencement of Construction Activities

11.3.1.7 Consequences for Failure to Post

11.3.2 Third Posting

11.3.2.1 Network Upgrades

11.3.2.2 Participating TO Interconnection Facilities

11.3.2.3 Separation of Third Posting

11.3.2.4 Failure to Post

11.4 Withdrawal Or Termination-Effect on Financial Security

11.4.1 Conditions for Partial Recovery of Interconnection Financial Security Upon Withdrawal of Interconnection Request or Termination of GIA

11.4.2 Determining Refundable Portion of the Interconnection Financial Security for Network Upgrades

11.4.2.1 Withdrawal Between the First Posting and the Deadline for the Second Posting

11.4.2.2 Withdrawal Between the Second Posting and the Commencement of Construction Activities

11.4.2.3 Special Treatment Based on Failure to Obtain Necessary Permit or Authorization from Governmental Authority

11.4.2.4 After Commencement of Construction Activities

11.4.2.5 Notification to CAISO and Accounting by Applicable Participating TO(s)

11.5 Adjusting Network Upgrade Postings Following Reassessment Process

12 ENGINEERING & PROCUREMENT (“E&P”) AGREEMENT

13 Generator Interconnection Agreement (GIA)

13.1 Tender

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

~~13.1.1~~

~~13.1.2~~

13.2 Negotiation

13.3 Execution And Filing

13.4 Commencement Of Interconnection Activities

13.5 Interconnection Customer To Meet PTO Handbook Requirements

14 PTOs Interconnection Facilities And Network Upgrades

14.1 Schedule

14.2 Construction Sequencing

14.2.1 General

14.2.2 Construction of Network Upgrades that are or were an Obligation of an Entity other than the Interconnection Customer

14.2.3 Advancing Construction of Network Upgrades that are Part of the CAISO's Transmission Plan

14.3 Network Upgrades

14.3.1 Initial Funding

14.3.2 Repayment of Amounts Advanced for Network Upgrades and Refund of Interconnection Financial Security

14.3.2.1 Repayment of Amounts Advanced Regarding Non-Phased Generating Facilities

14.3.2.2 Repayment of Amounts Advanced Regarding Phased Generating Facilities

14.3.2.3 Interest Payments and Assignment Rights

15 Miscellaneous

15.1 Confidentiality

15.1.1 Scope

15.1.2 Release of Confidential Information

15.1.3 Rights

15.1.4 No Warranties

15.1.5 Standard of Care

15.1.6 Order of Disclosure

15.1.7 Remedies

15.1.8 Disclosure to FERC, its Staff, or a State

~~15.1.9~~

~~15.1.10~~

~~15.1.11~~

15.2 Delegation of Responsibility

15.3 [Not Used]

15.4 [Not Used]

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

15.5 Disputes

15.5.1 Submission

15.5.2 External Arbitration Procedures

15.5.3 Arbitration Decisions

15.5.4 Costs

15.6 Local Furnishing Bonds

15.6.1 Participating TOs That Own Facilities Financed by Local Furnishing Bonds

15.6.2 Alternative Procedures for Requesting Interconnection Service

15.7 Change In CAISO Operational Control

Appendix 1 Interconnection Request

Attachment A Generating Facility Data

Appendix 2 [Intentionally Omitted]

Appendix 3 Generator Interconnection Study Process Agreement for Queue Clusters

Appendix A Assumptions Used in Conducting the Phase I Interconnection Study

Appendix B Data Form to Be Provided by the Interconnection Customer Prior to Commencement of the Phase II Interconnection Study

Appendix 4 Agreement for the Allocation of Responsibilities with Regard to Generator

Interconnection Procedures and Interconnection Study Agreements

Attachment A Interconnection Study Responsibility Allocation

Attachment B Contacts for Notices

Appendix 5 Schedule for Release and Review of Per Unit Costs

Appendix 6 GIDAP Agreement for Independent Study Process

Appendix A Assumptions Used in Conduction the System Impact Study

Appendix B Data Form to Be Provided by the Interconnection Customer Prior to Commencement of the Phase II Interconnection Study

Appendix 7 Application, Procedures, and Terms and Conditions for Interconnecting a Certified

Inverter-Based Small Generating Facility No Larger than 10kW ("10 kW Inverter Process")

Appendix 8 [Not Used]

Appendix 9 Certification Codes and Standards

Appendix 10 Certification of Small Generator Equipment Packages

* * *

3.5.1.1 Use of Interconnection Study Deposit.

The CAISO shall deposit all Interconnection Study Deposits in an interest bearing account at a bank or financial institution designated by the CAISO. The Interconnection

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

Study Deposit shall be applied to pay for prudent costs incurred by the CAISO, the Participating TOs, or third parties at the direction of the CAISO or Participating TOs, as applicable, to perform and administer the Interconnection Studies and to meet and otherwise communicate with Interconnection Customers with respect to their Interconnection Requests.

Except for proposed Generating Facilities processed under the Fast Track Process set forth in Section 5, the Interconnection Study Deposits shall be refundable as follows:

- (a) Should an Interconnection Request be withdrawn by the Interconnection Customer or be deemed withdrawn by the CAISO by written notice under Section 3.8 on or before thirty (30) calendar days following the Scoping Meeting, the CAISO shall refund to the Interconnection Customer any portion of the Interconnection Customer's Interconnection Study Deposit, including interest earned at the rate provided for in the interest-bearing account from the date of deposit to the date of withdrawal, that exceed the costs the CAISO, Participating TOs, and third parties have incurred on the Interconnection Customer's behalf.
- (b) Should an Interconnection Request made under Section 3.5.1 be withdrawn by the Interconnection Customer or be deemed withdrawn by the CAISO by written notice under Section 3.8 more than thirty (30) calendar days after the Scoping Meeting, but on or before thirty (30) calendar days following the Results Meeting (or the latest date permitted under this for a Results Meeting if a customer elects not to have a Results Meeting) for the Phase I Interconnection Study or the System Impact Study for Generating Facilities processed under the Independent Study Process, the CAISO shall refund to the Interconnection Customer the difference between (i) the Interconnection Customer's Interconnection Study Deposit and (ii) the greater of the costs the CAISO and Participating TOs have incurred on the Interconnection Customer's behalf or one-half of the original Interconnection Study Deposit up to a maximum of \$100,000, including interest earned at the rate provided for in the interest-bearing account from the date of deposit to the date of withdrawal.
Interconnection Customers in Queue Cluster 5 who have provided the Study Deposit may receive a refund of the Interconnection Study Deposit, less actual costs expended on the Interconnection Studies to date, by withdrawing from the Queue within ten (10) calendar days after July 25, 2012.
- (c) Should an Interconnection Request be withdrawn by the Interconnection Customer or be deemed withdrawn by the CAISO by written notice under Section 3.8 at any time more than thirty (30) calendar days after the Results Meeting (or the latest date permitted for a Results Meeting if a customer elects not to have a Results Meeting) for the Phase I Interconnection Study, or the System Impact Study for proposed Generating Facilities processed under the Independent Study Process, the Interconnection Study Deposit shall be non-refundable.
- (d) Upon execution of a GIA by an Interconnection Customer, the CAISO and the applicable Participating TOs, or the approval by FERC of an unexecuted GIA, the CAISO shall refund to the Interconnection Customer any portion of the Interconnection Customer's Interconnection Study Deposit, including interest earned at the rate provided for in the interest-bearing account from the date of deposit to the date of withdrawal, that exceeds the costs the CAISO, Participating TOs, and third parties have incurred on the Interconnection Customer's behalf.

Notwithstanding the foregoing, an Interconnection Customer that withdraws or is deemed to have withdrawn its Interconnection Request during an Interconnection Study Cycle shall be obligated to pay to the CAISO all costs in excess of the Interconnection Study Deposit that have been prudently incurred or irrevocably have been committed to be incurred with respect to that Interconnection Request prior to withdrawal. The CAISO will reimburse the applicable Participating TO(s) or third parties, as applicable, for all work performed on behalf of the withdrawn Interconnection Request at the CAISO's direction.

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

The Interconnection Customer must pay all monies due before it is allowed to obtain any Interconnection Study data or results.

All non-refundable portions of the Interconnection Study Deposit that exceed the costs the CAISO, Participating TOs, or third parties [engaged by the CAISO or Participating TOs](#) have incurred on the Interconnection Customer's behalf shall be treated in accordance with CAISO Tariff Section 37.9.4. In addition, any funds received by the CAISO from a Participating TO, pursuant to a requirement in the Participating TO's wholesale distribution tariff for funds to be distributed by the CAISO, shall be treated in accordance with CAISO Tariff Section 37.9.4.

Comment [SS16]: [Clarification](#)

* * *

3.5.2.2 Deficiencies in Interconnection Request.

An Interconnection Request will not be considered to be a valid request until the CAISO determines that the information contained in the Interconnection Request is complete and the Interconnection Customer has provided all items in satisfaction of Section 3.5.1. If an Interconnection Request fails to meet the requirements set forth in Section 3.5.1, the CAISO shall include in its notification to the Interconnection Customer under Section 3.5.2.1 the reasons for such failure and that the Interconnection Request does not constitute a valid request. The Interconnection Customer shall provide the CAISO the additional requested information needed to constitute a valid request. Whenever additional requested information is provided by the Interconnection Customer, the CAISO shall notify the Interconnection Customer within five (5) Business Days of receipt of the additional requested information whether the Interconnection Request is valid. If the Interconnection Request continues to fail to meet the requirements set forth in Section 3.5.1, the CAISO shall include in its notification to the Interconnection Customer the reasons for such failure. If an Interconnection Request has not been deemed valid, the Interconnection Customer must submit all information necessary to meet the requirements of Section 3.5.1 no later than twenty (20) Business Days after the close of the applicable Cluster Application Window or ten (10) Business Days after the CAISO first provided notice that the Interconnection Request was not valid, whichever is later. Interconnection Requests that have not met the requirements of Section 3.5.1 within twenty (20) Business Days after the close of the applicable Cluster Application Window or ten (10) Business Days after the CAISO first provided notice that the Interconnection Request was not valid, whichever is later, will be deemed invalid and will not be included in Interconnection Study Cycle or otherwise studied.

Interconnection Requests deemed invalid under this Section 3.5.2.2 are not subject to Section 3.8. Interconnection Customers with invalid Interconnection Request under this Section 3.5.2.2 may seek relief under Section ~~4415~~.5 by so notifying the CAISO within two (2) Business Days of the notice of invalidity.

* * *

3.7 Coordination With Affected Systems

The CAISO will notify the Affected System Operators that are potentially affected by the Interconnection Customer's Interconnection Request or Group Study within which the Interconnection Customer's Interconnection Request will be studied. The CAISO will coordinate the conduct of any studies required to determine the impact of the Interconnection Request on Affected Systems with Affected System Operators, to the extent possible, and, if possible, the CAISO will include those results (if available) in its applicable Interconnection Study within the time frame specified in this GIDAP. The CAISO will include such Affected System Operators in all meetings held with the Interconnection Customer as required by this GIDAP. The Interconnection Customer will cooperate with the CAISO in all matters related to the conduct of studies and the determination of modifications to Affected Systems, including providing consent to

Interconnection Process Enhancements are highlighted [yellow](#).
Language currently pending on compliance with FERC is shaded [grey](#).
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

CAISO's identification to Interconnection Customer's name, Generating Facility project name, and release of information which the Interconnection Customer provided as part of its Interconnection Request to the Affected System, participating in any coordinating activities and communications undertaken by the Affected System or CAISO, signing separate study agreements with Affected System owners and paying for necessary studies. ~~An entity which may be an Affected System shall cooperate with the CAISO in all matters related to the conduct of studies and the determination of modifications to Affected Systems.~~

* * *

4.2.1.2 Requirement Set Number Two: for Requests for Independent Study of Behind-the-Meter Capacity Expansion of Generating Facilities

This Section 4.2.1.2 applies to an Interconnection Request relating to a behind-the-meter capacity expansion ~~where the existing of a~~ Generating Facility ~~prime mover is wind technology or solar technology~~. Such an Interconnection Request submitted under the Independent Study Process will satisfy the requirements of Section 4.2.1 if it satisfies all of the following technical and business criteria ~~for behind-the-meter capacity expansion of a Generating Facility~~:

- (i) Technical criteria.
 - 1) The total nameplate capacity of the existing Generating Facility plus the incremental increase in capacity does not exceed in the aggregate one hundred twenty-five (125) percent of its previously studied capacity and does not exceed, in the aggregate, one hundred (100) MW.
 - 2) The behind-the-meter capacity expansion shall not take place until after the original Generating Facility has achieved Commercial Operation and all Reliability Network Upgrades for the original Generating Facility have been placed in service. An Interconnection Request for behind-the-meter capacity expansion may be submitted prior to the Commercial Operation Date of the original Generating Facility and/or before the Reliability Network Upgrades for the original Generating Facility have been placed in service.
 - 3) The expanded capacity for the Generating Facility has been placed under a separate breaker (the expansion breaker) such that the expansion can be metered separately at all times. With the consent of the CAISO and the applicable Participating TO(s), the Interconnection Customer may make the Generating Facilities that will be tied to the expansion breaker a mixture of original and expanded facilities such that the total installed capacity behind the expansion breaker is equal to or greater than the planned amount of behind-the-meter capacity expansion.
 - 4) Unless specifically requested by the CAISO, the total output of the Generating Facility does not exceed its originally studied capacity at any time. The CAISO will have the authority to trip the expansion breaker if the total output of the Generating Facility exceeds the originally studied capacity.
 - 5) The processing of an Interconnection Request for behind-the-meter expansion under the Independent Study Process shall not result in any increase in the rated Generating Facility electrical output (MW capacity) beyond the rating which pre-existed the Interconnection

Comment [SS17]: Should this be a defined term?

Comment [SS18]: Would apply where the original generator reaches COD before all RNU's are in service, pursuant to a Limited Operation study.

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

Request. Further, the processed Interconnection Request shall not operate as a basis under the CAISO Tariff to increase the Net Qualifying Capacity of the Generating Facility beyond the rating which pre-existed the Interconnection Request.

- (ii) Business criteria.
- 1) The Deliverability Status (Full Capacity, Partial Deliverability or Energy-Only) of the capacity expansion is the same as the Deliverability Status specified for the formally studied Generating Facility.
 - 2) The GIA is amended to reflect the revised operational features of the Generating Facility capacity expansion.
 - 3) The Interconnection Customer may at any time request that the CAISO convert the Interconnection Request for behind-the-meter expansion to an Independent Study Process Interconnection Request to evaluate an incremental increase in electrical output (MW generating capacity) for the existing Generating Facility. The Interconnection Customer must accompany such a conversion request with an appropriate Interconnection Study Deposit and agree to comply with other sections of Section 4 applicable to an Independent Study Process Interconnection Request.

4.2.2 Short Circuit Test

If the short circuit contribution from the Generating Facility (existing or proposed) being tested at the transmission facility identified in Section 4.2.1 1(i) is less than 100 amperes, the Generating Facility shall pass the short circuit test.

* * *

6.1.3 Grouping Interconnection Requests

At the CAISO's option, and in coordination with the applicable Participating TO(s), Interconnection Requests received during the Cluster Application Window for a particular year may be studied individually or in a Group Study for the purpose of conducting one or more of the analyses forming the Interconnection Studies. For each Interconnection Study within an Interconnection Study Cycle, the CAISO may develop one or more Group Studies. A Group Study will include, at the CAISO's sole judgment after coordination with the applicable Participating TO(s), Interconnection Requests that electrically affect one another with respect to the analysis being performed and the annual Transmission Plan, without regard to the nature of the underlying Interconnection Service. The CAISO may also, in its sole judgment after coordination with the applicable Participating TO(s), conduct an Interconnection Study for an Interconnection Request separately to the extent warranted by Good Utility Practice based upon the electrical remoteness of the proposed Generating Facility from other Generating Facilities with Interconnection Requests in the Cluster Application Window for a particular year.

An Interconnection Request's inclusion in a Group Study will not relieve the CAISO or Participating TO(s) from meeting the timelines for conducting the Phase I Interconnection Study provided in the GIDAP. Group Studies shall be conducted in such a manner to ensure the efficient implementation of the annual CAISO Transmission Plan in light of the transmission system's capabilities at the time of each study.

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

* * *

6.6 Phase I Interconnection Study Procedures

The CAISO shall coordinate the Phase I Interconnection Study with applicable Participating TO(s) pursuant to Section 3.2 and any Affected System that is affected by the Interconnection Request pursuant to Section 3.7. Existing studies shall be used to the extent practicable when conducting the Phase I Interconnection Study. The CAISO will coordinate Base Case development with the applicable Participating TOs to ensure the Base Cases are accurately developed. The CAISO shall use Reasonable Efforts to complete and issue to Interconnection Customers the Phase I Interconnection Study report within two hundred (200) days after the commencement of the Phase I Interconnection Study for Queue Cluster 5 and within one hundred seventy (170) days after the annual commencement of the Phase I Interconnection Study beginning with Queue Cluster 6; however, each individual study or Group Studies may be completed prior to this maximum time where practicable based on factors, including, but not limited to, the number of Interconnection Requests in the Cluster Application Window, study complexity, and reasonable availability of subcontractors as provided under Section 15.2. The CAISO will share applicable study results with the applicable Participating TO(s) for review and comment and will incorporate comments into the study report. The CAISO will issue a final Phase I Interconnection Study report to the Interconnection Customer. At the time of completion of the Phase I Interconnection Study, the CAISO may, at the Interconnection Customer's request, determine whether the provisions of Section 8.6 apply.

At any time the CAISO determines that it will not meet the required time frame for completing the Phase I Interconnection Study due to the large number of Interconnection Requests in the ~~two~~-associated Cluster Application Windows, study complexity, or unavailability of subcontractors on a reasonable basis to perform the study in the required time frame, the CAISO shall notify the Interconnection Customers as to the schedule status of the Phase I Interconnection Study and provide an estimated completion date with an explanation of the reasons why additional time is required.

Upon request, the CAISO shall provide the Interconnection Customer all supporting documentation, workpapers and relevant pre-Interconnection Request and post-Interconnection Request power flow, short circuit and stability databases for the Phase I Interconnection Study, subject to confidentiality arrangements consistent with Section 15.1.

6.7 Phase I Interconnection Study Results Meeting

Within thirty (30) calendar days of issuing the Phase I Interconnection Study report to the Interconnection Customer, the applicable Participating TO(s), the CAISO and the Interconnection Customer shall hold a Results Meeting to discuss the results of the Phase I Interconnection Study, including assigned cost responsibility. The CAISO shall prepare the minutes from the meetings, and provide the Interconnection Customer and the other attendees an opportunity to confirm the accuracy thereof.

Should the Interconnection Customer provide written comments on the final Phase I Interconnection Study report within ten (10) Business Days of receipt of the report, but in no event less than three (3) Business Days before the Results Meeting conducted to discuss the report, whichever is sooner, the ISO will address the written comments in the Phase I Interconnection Study Results Meeting. Should the Interconnection Customer provide comments at any later time (up to the time of the Results Meeting), then such comments shall be considered informal inquiries to which the CAISO will provide informal, informational responses at the Results Meeting, to the extent possible. The Interconnection Customer may submit, in writing, additional comments on the final Phase I Interconnection Study report up to (3) Business Days following the Results Meeting. Based on any discussion at the Results Meeting and any comments received,

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

the CAISO (in consultation with the applicable Participating TO(s)) will determine, in accordance with Section 6.8, whether it is necessary to follow the final Phase I Interconnection Study report with a revised study report or an addendum. The CAISO will issue any such revised report or addendum to the Interconnection Customer no later than fifteen (15) Business Days following the Results Meeting.

6.7.2.2

At the Phase I Interconnection Study Results Meeting, the Interconnection Customer should be prepared to discuss any desired modifications to the Interconnection Request. After the issuance of the final Phase I Interconnection Study, but no later than ten (10) Business Days following the Phase I Interconnection Study Results Meeting, the Interconnection Customer shall submit to the CAISO, in writing, modifications to any information provided in the Interconnection Request. The CAISO will forward the Interconnection Customer's modification to the applicable Participating TO(s) within one (1) Business Day of receipt.

Modifications permitted under this Section shall include specifically: (a) a decrease in the electrical output (MW) of the proposed project pursuant to Section 7.4; (b) modifying the technical parameters associated with the Generating Facility technology or the Generating Facility step-up transformer impedance characteristics; and (c) modifying the interconnection configuration.

For any modification other than these, the Interconnection Customer may must first request that the CAISO evaluate whether such modification is a Material Modification. In response to the Interconnection Customer's request, the CAISO, in coordination with the affected Participating TO(s) and, if applicable, any Affected System Operator, shall evaluate the proposed modifications prior to making them and the CAISO shall inform the Interconnection Customer in writing of whether the modifications would constitute a Material Modification.

The CAISO may engage the services of the applicable Participating TO to assess the modification, in which case costs for both the Participating TO and CAISO shall be borne by the party making the request under Section 6.7.2, and such costs shall be included in any CAISO invoice for modification assessment activities.

Any change to the Point of Interconnection, except for that specified by the CAISO in an Interconnection Study or otherwise allowed under this Section, shall constitute a Material Modification. The Interconnection Customer may then withdraw the proposed modification or proceed with a new Interconnection Request for such modification.

The Interconnection Customer shall remain eligible for the Phase II Interconnection Study if the modifications are in accordance with this Section.

The Interconnection Customer should also notify the CAISO, no later than ten (10) Business Days following the Phase I Interconnection Study Results Meeting, if it wishes to receive expedited treatment of its draft Generator Interconnection Agreement, i.e., that it wishes to receive such draft within (30) Calendar Days after the final Phase II Interconnection Study report, or the Facilities Study report (or System Impact Study report if the Facilities Study is waived).

6.7.2.3

The Interconnection Customer shall provide the CAISO a \$10,000 deposit for the modification assessment at the time the request is submitted. Alternatively, the Interconnection Customer may elect to use existing study funds to the extent that the CAISO is still holding at least \$10,000 in study funds that have not already been encumbered. Except as provided below, any modification assessment will be concluded, and a response provided to the Interconnection Customer in writing, within forty-five (45) calendar days from the date the CAISO receives all of the following: the Interconnection Customer's written notice to modify the project, technical data required to assess the request and payment of the \$10,000 deposit. If the modification assessment cannot be completed within that time period, the CAISO shall notify the Interconnection Customer

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Indent: First line: 0"

Comment [SS19]: Consistent with the concept of self-prioritization. As LSA indicated earlier, LSA favors addressing this element of self-prioritization in the tariff and not in the BPMs, so the tariff and BPM provisions do not contradict each other.

Formatted: Highlight

Formatted: Highlight

Comment [SS20]: See above – IC needs to know how much of its prior Study Deposit money is not "encumbered." What does this mean, and how will the CAISO communicate this information?

Formatted: Highlight

Interconnection Process Enhancements are highlighted yellow. Language currently pending on compliance with FERC is shaded grey. All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

and provide an estimated completion date with an explanation of the reasons why additional time is required. The Interconnection Customer will be responsible for the actual costs incurred by the CAISO and applicable Participating TO(s) in conducting the modification assessment. If the actual costs of the modification assessment are less than the deposit provided by the Interconnection Customer, the Interconnection Customer will be refunded the balance. If the actual costs of the modification assessment are greater than the deposit provided by the Interconnection Customer, the Interconnection Customer shall pay the balance when invoiced. The CAISO shall coordinate the modification request results with the Participating TO(s).

* * *

7.2 Full/Partial Capacity Deliverability Options for Interconnection Customers

This section applies to Interconnection Requests for which the Generating Facility Deliverability Status is either Full Capacity or Partial Capacity.

Within such Appendix B, the Interconnection Customer must select one of two options with respect to its Generating Facility:

Option (A), which means that the Generating Facility requires TP Deliverability to be able to continue to Commercial Operation. If the Interconnection Customer selects Option (A), then the Interconnection Customer shall be required to make an initial posting of Interconnection Financial Security under Section 11.2 for the cost responsibility assigned to it in the Phase I Interconnection Study for RNUs and LDNUs; or, Option (B), which means that the Interconnection Customer will assume cost responsibility for Delivery Network Upgrades (both ADNUs and LDNUs, to the extent applicable) without cash repayment under Section 14.2-43.2 to the extent that sufficient TP Deliverability is not allocated to the Generating Facility to provide its requested Deliverability Status. If the Interconnection Customer selects Option (B) then the Interconnection Customer shall be required to make an initial posting of Interconnection Financial Security under Section 11.2 for the cost responsibility assigned to it in the Phase I Interconnection Study for RNUs, LDNUs and ADNUs. **There is no maximum cost value for ADNUs.**

Formatted: Highlight

7.3 Postings and Cost Estimates for Network Upgrades

Until such time as the Phase II Interconnection Study report is issued to the Interconnection Customer, the costs assigned to Interconnection Customers for RNUs and LDNUs in the Phase I Interconnection Study report shall establish the maximum value for

- (i) each Interconnection Customer's cost responsibility; and
- (ii) the initial posting of Interconnection Financial Security required from each Interconnection Customer under Section 11.2 for such Network Upgrades.

The Phase I Interconnection Study report shall set forth the applicable cost estimates for RNUs, LDNUs, ADNUs and Participating TOs Interconnection Facilities that shall be the basis for the initial Interconnection Financial Security Posting under Section 11.2.

7.4 Reassessment Process

7.4.1

The ISO will perform a reassessment of the Phase I Interconnection Study base case prior to the beginning of the GIDAP Phase II Interconnection Studies. The reassessment will evaluate the impacts on those Network Upgrades identified in previous interconnection studies and assumed in the Phase I Interconnection Study of:

- (a) Interconnection Request withdrawals occurring after the completion of the Phase II Interconnection Studies for the immediately preceding Queue Cluster;
- (b) the performance of earlier queued Interconnection Customers with executed GIAs with respect to required milestones and other obligations,

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

- (c) compliance of earlier queued Interconnection Customers that were allocated TP Deliverability under ~~this GIDAP~~ [Section 8.9.3](#) with the retention criteria;
 - (d) the results of the TP Deliverability allocation from the prior Interconnection Study cycle; and,
 - (e) transmission additions and upgrades approved in the most recent TPP cycle.
- The reassessment will be used to develop the base case for the Phase II Interconnection Study

* * *

8.1.1 Purpose of the Phase II Interconnection Study

The CAISO, in coordination with the applicable Participating TO(s), will conduct a Phase II Interconnection Study that will incorporate eligible Interconnection Requests from the previous Phase I Interconnection Study. The Phase II Interconnection Study shall:

- (i) update, as necessary, analyses performed in the Phase I Interconnection Studies to account for the withdrawal of Interconnection Requests from the current Queue Cluster;
- (ii) identify final RNUs needed to physically and reliably interconnect the Generating Facilities and provide final cost estimates;
- (iii) identify final LDNUs needed to interconnect those Generating Facilities selecting Full Capacity or Partial Capacity Deliverability Status and provide final cost estimates,
- (iv) identify final ADNUs for Interconnection Customers selecting Option (B), as provided below and provide revised cost estimates;
- (v) identify, for each Interconnection Request, the Participating TO's Interconnection Facilities for the final Point of Interconnection and provide a +/-20% cost estimate; and
- (vi) coordinate in-service timing requirements based on operational studies in order to facilitate achievement of the Commercial Operation Dates of the Generating Facilities.

The Phase II Interconnection Study report shall set forth the applicable cost estimates for RNUs, LDNUs, ADNUs and Participating TOs Interconnection Facilities that shall be the basis for Interconnection Financial Security Postings under Section ~~41.2 and~~ 11.3 Where the cost estimations applicable to the total of RNUs and LDNUs are based upon the Phase I Interconnection Study (because the cost estimation for the subtotal of RNUs and LDNUs were lower and so establish maximum cost responsibility under Section 10.1), the Phase II Interconnection Study report shall recite this fact.

* * *

8.6 Accelerated Phase II Interconnection Study Process

The Phase II Interconnection Study shall be completed within one hundred fifty (150) calendar days following the later of (1) the posting of the initial Interconnection Financial Security or (2) the completion of the re-assessment in preparation for the Phase II Interconnection Study under Section 7.4, where the Interconnection Request meets the following criteria: (i) the Interconnection Request was not grouped with any other Interconnection Requests during the Phase I Interconnection Study or was identified as interconnecting to a point of available transmission during the Phase I Interconnection Study, and (ii) the Interconnection Customer is able to demonstrate that the general Phase II Interconnection Study timeline under LGIP Section 7.5 is not sufficient to accommodate the Commercial Operation Date of the Large Generating Facility.

Formatted: Indent: Left: 1"

Comment [SS21]: Could the CAISO please define this term? It is a source of considerable confusion. Do you mean a POI on a transmission line that is already built or has otherwise been approved by the CAISO?

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

In addition to the above criteria, the CAISO may apply to FERC in coordination with the Interconnection Customer for a waiver of the timelines in this LGIP to meet the schedule required by an order, ruling, or regulation of the Governor of the State of California, the CPUC, or the CEC.

* * *

8.9.1 First Component: Representing TP Deliverability Used by Prior Commitments

The CAISO will identify the following commitments that will utilize MW quantities of TP Deliverability:

- (a) The proposed Generating Facilities corresponding to earlier queued Interconnection Requests meeting the criteria set forth below:
 - (i) proposed Generating Facilities in Queue Cluster 4 or earlier that have executed PPAs with Load-Serving Entities and have GIAs that are in good standing.
 - (ii) proposed Generating Facilities in Queue Cluster 5 and subsequent Queue Clusters that were previously allocated TP Deliverability and have met the criteria to retain the allocation set forth in Section 8.9.43.
- (b) any Maximum Import Capability included as a planning objective in the Transmission Plan;
- (c) any other commitments having a basis in the Transmission Plan.

This first component is performed for the purpose of determining the amount of TP Deliverability available for allocation to the current queue cluster in accordance with section 8.9.2, and shall not affect the rights and obligations of proposed Generating Facilities in Queue Cluster 4 or earlier with respect to the construction and funding of Network Upgrades identified for such Generating Facilities, or their requested Deliverability Status. Such rights and obligations will continue to be determined pursuant to the GIP and the Generating Facility's GIA.

8.9.2 Second Component: Allocating TP Deliverability To The Current Queue Cluster

If the CAISO determines, under Section 8.9.1 above, that no TP Deliverability exists for allocation to the current Queue Cluster, then no allocation of TP Deliverability shall be made to the current Queue Cluster. If TP Deliverability is available for allocation, then the ISO will allocate such capacity to eligible Generating Facilities.

The CAISO shall allocate any TP Deliverability available after taking into account the commitments described in the prior section to eligible Generating Facilities in the current Interconnection Study Cycle and eligible parked Generating Facilities from the previous Interconnection Study Cycle.

The ISO shall allocate available TP Deliverability to Generating Facilities according to the Interconnection Customers' demonstration of having met the criteria listed below for all or a portion of the full MW generating capacity of the Generating Facility as specified in the

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

Interconnection Request. Where a criterion is met by a portion of the full MW generating capacity of the Generating Facility, the eligibility score associated with that criterion shall apply to the portion that meets the criterion. The demonstration must relate to the same proposed Generating Facility as described in Appendix A to the Interconnection Request. The Generating Facility shall be assigned a numerical score reflecting the Interconnection Customer's demonstration of having met the criteria below under the methodology set forth in the Business Practice Manual. At a minimum, the Generating Facility must meet (1)d and either (2)a or (2)d.

- (1) Permitting status. An Interconnection Customer's Generating Facility must meet at least one of the following:
 - a. The Interconnection Customer has received its final governmental permit or authorization allowing the Generating Facility to commence construction.
 - b. The Interconnection Customer has received a draft environmental report document (or equivalent environmental permitting document) indicating likely approval of the requested permit and/or which indicates that the permitting authority has not found an environmental impact which would likely prevent the permit approval.
 - c. The Interconnection Customer has applied for the necessary governmental permits or authorizations and the authority has deemed such documentation as data adequate for the authority to initiate its review process.
 - d. The Interconnection Customer has applied for the necessary governmental permit or authorization for the construction.
- (2) Project financing status. An Interconnection Customer's Generating Facility must meet at least one of the following criteria:
 - a. The Generating Facility will be balance-sheet financed or has otherwise received a commitment of project financing, and the Interconnection Customer represents to the ISO that either it has a regulator-approved power purchase agreement or that the Interconnection Customer is proceeding to commercial operation without a power purchase agreement.
 - b. The Interconnection Customer has an executed and regulator-approved power purchase agreement.
 - c. The Interconnection Customer has an executed power purchase agreement but such agreement has not yet received regulatory approval.
 - d. The Interconnection Customer does not have an executed power purchase agreement but the Interconnection Customer is included on an active short list or other commercially recognized method of preferential ranking of power providers by a prospective purchaser Load Serving Entity.
- (3) Land acquisition
 - a. The Interconnection Customer demonstrates a present legal right to begin construction of the Generation Facility on one hundred percent (100%) of the real property footprint necessary for the entire Generating facility.
 - b. The Interconnection Customer demonstrates Site Exclusivity.

In allocating TP Deliverability under this section, in a situation where the available amount of TP Deliverability can accommodate only one out of two or more Generating Facilities requesting TP Deliverability and such Generating Facilities score equally under

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

the criteria above, then the CAISO will allocate the TP Deliverability to such equally scoring Generating Facilities according to lowest LDNU cost estimates.

8.9.4 Parking for Option (A) Generating Facilities

For an Option (A) Generating Facility in the current Interconnection Study Cycle which either was allocated less TP Deliverability than requested or does not desire to accept the amount allocated the Interconnection Customer shall select one of the following options:

- (1) Withdraw its Interconnection Request
- (2) Enter into a GIA, in which case the Interconnection Request shall automatically convert to Energy Only Deliverability Status. In such circumstances, upon execution of the GIA, any Interconnection Financial Security shall be adjusted to remove the obligation for Interconnection Financial Security pertaining to LDNUs
- (3) Park the Interconnection Request; in which case the Interconnection Request may remain in the Interconnection queue until the next allocation of TP Deliverability in which it may participate in accordance with the requirements of Section 8.9.4.2. Parking an Interconnection Request does not confer a preference with respect to any other Interconnection Request with respect to allocation of TP Deliverability.

9.2 Annual Full Capacity Deliverability Option

9.2.1 Generating Facilities eligible for Deliverability under this Section are

- (i) a Generating Facility previously studied as Energy-Only Deliverability Status in ~~the last any prior~~ Interconnection Study ~~Cycle~~ under the CAISO Tariff (including a Small Generating Facility studied under the provisions of Appendix S of the CAISO Tariff) or which has GIA under which the Generating Facility is Energy Only Deliverability Status and such GIA is in good standing at the time of request under this Section;
- (ii) an Option (A) Generating Facility not allocated TP Deliverability in ~~the last any prior~~ Interconnection Study ~~Cycle~~ that converted to Energy-Only Deliverability Status and has a GIA in good standing and desires to seek additional Deliverability with respect to the Energy Only portion of the Generating Facility;
- ~~(iii)~~ ~~(iii)~~ an Option (B) Generating Facility which chose Partial Capacity Deliverability Status and has a GIA in good standing, and desires to seek additional Deliverability with respect to the Energy Only portion of its Generating Facility.
- ~~(iii)~~ ~~(iv)~~ An Option (A) or Option (B) Generating Facility seeking additional Deliverability (1) for added behind-the-meter capacity; or (2) in excess of the amount studied to accommodate conversion of all or a portion of the Generating Facility to another technology.

An eligible Generating Facility will have an option to be studied to determine whether it can be designated for Full Capacity Deliverability Status or Partial Capacity Deliverability Status based on available transmission capacity. To be considered in the annual assessment, the Interconnection Customer must make such a request which complies with Section 9.2.3 below within the corresponding annual Cluster Application Window.

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

Comment [SS22]: Deleted "Cycle" because it is unnecessary – e.g., the project could have been a serial project that did not participate in a study "Cycle."

Formatted: Highlight

Formatted: Bullets and Numbering

Formatted: Highlight

FOR DISCUSSION PURPOSES ONLY

* * *

11.2.3.2 Large Generator Interconnection Customers

Each Interconnection Customer for a Large Generating Facility assigned to a Queue Cluster and each Interconnection Customer for a Large Generating Facility in the Independent Study Process shall post an Interconnection Financial Security instrument as follows:

1) Interconnection Customers selecting Energy Only Deliverability Status must post for RNUs.

The posting amount for such RNUs shall equal the lesser of (i) fifteen percent (15%) of the total RNU cost responsibility assigned to the Interconnection Customer in the final Phase I Interconnection Study or System Impact Study for Network Upgrades, (ii) \$20,000 per megawatt of electrical output of the Large Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request, including any requested modifications thereto, or (iii) \$7,500,000, but in no event less than \$500,000.

In addition, if an Interconnection Customer switches its status from Full Capacity Deliverability Status or Partial Capacity Deliverability Status to Energy-Only Deliverability Status within ~~five-ten~~ (510) Business Days following the Phase I Interconnection Study Results Meeting, the required Interconnection Financial Security for Network Upgrades shall, for purposes of this section, be additionally capped at an amount no greater than the total cost responsibility assigned to the Interconnection Customer in the Phase I Interconnection Study for Reliability Network Upgrades.

2) Interconnection Customers selecting Option (A) Full Capacity or Partial Capacity Deliverability Status must post for RNUs and LDNUs.

The posting amount for such RNUs and LDNUs shall equal the lesser of (i) fifteen percent (15%) of the total RNU and LDNU cost responsibility assigned to the Interconnection Customer in the final Phase I Interconnection Study or System Impact Study for Network Upgrades, (ii) \$20,000 per megawatt of electrical output of the Large Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request, including any requested modifications thereto, or (iii) \$7,500,000, but in no event less than \$500,000.

3) Interconnection Customers selecting Option (B) Full Capacity or Partial Capacity Deliverability Status must post for RNUs, LDNUs and ADNUs.

The posting amount for such RNUs, LDNUs and ADNUs shall be equal to the lesser of (i) fifteen percent (15%) of the total cost responsibility assigned to the Interconnection Customer in the final Phase I Interconnection Study or System Impact Study for Network Upgrades, (ii) \$20,000 per megawatt of electrical output of the Large Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request, including any requested modifications thereto, or (iii) \$7,500,000, but in no event less than \$500,000.

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

11.2.4 Posting Amount for Participating TO Interconnection Facilities.

11.2.4.1 Small Generator Interconnection Customers

Each Interconnection Customer for a Small Generating Facility assigned to a Queue Cluster and each Interconnection Customer for a Small Generating Facility in the Independent Study Process shall post an Interconnection Financial Security instrument in an amount **equal to the lesser of (i) fifteen (15) percent of the total cost responsibility assigned to the Interconnection Customer in the final Phase I Interconnection Study or System Impact Study for Participating TO's Interconnection Facilities or (ii) \$20,000 per megawatt of electrical output of the Small Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request, including any requested modifications thereto, but in no event less than \$50,000.**

11.2.5 Cost Estimates Less than Minimum Posting Amounts.

If the costs of either the estimated Network Upgrades or the Participating TO Interconnection Facilities are less than the minimum posting amounts that would apply under Sections ~~40.2.311.2.4.1~~ or ~~40.2.411.2.4.2~~, then the posting amount required will be equal to the estimated Network Upgrades amount or the Participating TO Interconnection Facilities amount.

11.3.1.4.3 Cost Estimates Less than Minimum Posting Amounts.

If the costs of the estimated Network Upgrades are less than the posting amounts set forth in Section 11.3.1.4-~~2~~ above, then posting amount required will be equal to the estimated Network Upgrade amount.

11.3.1.6 Early Commencement of Construction Activities

If the start date for Construction Activities of Network Upgrades or Participating TO's Interconnection Facilities on behalf of the Interconnection Customer is prior to one hundred eighty (180) calendar days after issuance of the final Phase II Interconnection Study report for Interconnection Customers in a Queue Cluster or prior to one hundred twenty (120) calendar days after issuance of the final Facilities Study report for Interconnection Customers in the Independent Study Process, that start date must be set forth in the Interconnection Customer's GIA, and the Interconnection Customer shall make its second posting of Interconnection Financial Security pursuant to Section ~~4011.3.2~~ rather than Section ~~4011.3.1~~.

11.3.2.1 Network Upgrades

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

With respect to the Interconnection Financial Security Instrument for Network Upgrades, the Interconnection Customer shall modify this Instrument so that it equals one hundred (100) percent of the total cost responsibility assigned to the Interconnection Customer for RNUs, LDNUs and ADNUs as determined in Section 11.3.1.34.1 for Small Generator Interconnection Customers or in Section 11.3.1.34.2 for Large Generator Interconnection Customers.

An Interconnection Customer whose Option (B) Generating Facility was not allocated TP Deliverability and elects to have a party other than the applicable Participating TO(s) construct an LDNU or ADNU is not required to make the third posting for its cost responsibilities for such LDNU or ADNU. However, such Interconnection Customer will be required to demonstrate its financial capability to pay for the full cost of construction of its share, as applicable, of the LDNU or ADNU pursuant to Section 24.4.6.1 of the CAISO Tariff. An Interconnection Customer's election to have a party other than an applicable Participating TO construct an LDNU or ADNU does not relieve the Interconnection Customer of the responsibility to fund or construct such LDNU or ADNU. Upon the Interconnection Customer's demonstration to the CAISO that the Interconnection Customer has expended the amount of the avoided posting requirement on construction of the LDNU or ADNU described here, the Interconnection Customer's second posting for these facilities will be returned to the Interconnection Customer, unless the Participating TO and Interconnection Customer agree to an alternative arrangement.

11.4.2.1 Withdrawal Between the First Posting and the Deadline for the Second Posting

If the Interconnection Customer either withdraws its Interconnection Request or terminates its GIA under any of the conditions (a)-(f) of Section 11.4.1 above and at any time between the initial posting and the deadline for the second posting of the Interconnection Financial Security for applicable Network Upgrades, then the applicable Participating TO(s) shall liquidate the Interconnection Financial Security for the applicable Network Upgrades and reimburse the Interconnection Customer the lesser of:

- a. the Interconnection Financial Security plus (any other provided security plus any separately provided capital) less (all costs and expenses incurred or irrevocably committed to finance Pre-Construction Activities for Network Upgrades on behalf of the Interconnection Customer), or
 - b. the Interconnection Financial Security plus (any other provided security plus any separately provided capital) minus the lesser of fifty (50) percent of the value of the posted Interconnection Financial Security for Network Upgrades or
- e. \$10,000 per requested and approved megawatt of the Generating Facility Capacity at the time of withdrawal.

11.4.2.5 Notification to CAISO and Accounting by Applicable Participating TO(s).

The applicable Participating TO(s) shall notify the CAISO within one (1) Business Day of liquidating any Interconnection Financial Security. Within twenty (20) calendar days of any liquidating event, the applicable Participating TO(s) shall provide the CAISO and Interconnection Customer with an accounting of the disposition of the proceeds of the liquidated Interconnection Financial Security and remit to the CAISO all proceeds not otherwise reimbursed to the

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FERC is shaded grey.
All other proposed changes are for clarifying purposes.

Formatted: Indent: Left: 0.5", Hanging: 0.25"

FOR DISCUSSION PURPOSES ONLY

Interconnection Customer or applied to costs incurred or irrevocably committed by the applicable Participating TO(s) on behalf of the Interconnection Customer in accordance with this Section.

All non-refundable portions of the Interconnection Financial Security remitted to the CAISO in accordance with this Section shall be treated in accordance with CAISO Tariff Section 37.9.4. In addition, any funds received by the CAISO from a Participating TO, pursuant to a requirement in the Participating TO's wholesale distribution tariff for funds to be distributed by the CAISO, shall be treated in accordance with CAISO Tariff Section 37.9.4.

Section 12 Engineering & Procurement ("E&P") Agreement

Prior to executing a GIA, an Interconnection Customer may, in order to advance the implementation of its interconnection, request and the applicable Participating TO(s) shall offer the Interconnection Customer, an E&P Agreement that authorizes the applicable Participating TO(s) to begin engineering and procurement of long lead-time items necessary for the establishment of the interconnection. However, the applicable Participating TO(s) shall not be obligated to offer an E&P Agreement if the Interconnection Customer is in Dispute Resolution as a result of an allegation that the Interconnection Customer has failed to meet any milestones or comply with any prerequisites specified in other parts of the GIDAP. The E&P Agreement is an optional procedure. The E&P Agreement shall provide for the Interconnection Customer to pay the cost of all activities authorized by the Interconnection Customer and to make advance payments or provide other satisfactory security for such costs.

The Interconnection Customer shall pay the cost of such authorized activities and any cancellation costs for equipment that is already ordered for its interconnection, which cannot be mitigated as hereafter described, whether or not such items or equipment later become unnecessary. If the Interconnection Customer withdraws its application for interconnection or either Party terminates the E&P Agreement, to the extent the equipment ordered can be canceled under reasonable terms, the Interconnection Customer shall be obligated to pay the associated cancellation costs. To the extent that the equipment cannot be reasonably canceled, the applicable Participating TO(s) may elect: (i) to take title to the equipment, in which event the applicable Participating TO(s) shall refund the Interconnection Customer any amounts paid by Interconnection Customer for such equipment and shall pay the cost of delivery of such equipment, or (ii) to transfer title to and deliver such equipment to the Interconnection Customer, in which event the Interconnection Customer shall pay any unpaid balance and cost of delivery of such equipment.

Section 13 Generator Interconnection Agreement (GIA)

13.1 Tender

13.1.1 If the Interconnection Customer requested Full Capacity Deliverability Status or Partial Deliverability Status, then within thirty (30) Calendar Days after the CAISO provides the final updated Phase II Interconnection Study report, or the Facilities Study report (or System Impact Study report if the Facilities Study is waived), which includes the allocation of TP Deliverability to the Interconnection Customer, the applicable Participating TO(s) and the CAISO shall tender a draft GIA, together with draft appendices. The applicable Participating TO shall tender a draft GIA, together with draft appendices, if the Interconnection Customer requested Energy-Only Deliverability Status: (1) then within thirty (30) Calendar Days following the results meeting for the final Phase II Interconnection Study, Facilities Study, or System Impact Study if the Facilities Study is waived; or (2) if the Interconnection Customer elected expedited treatment pursuant to Section XXXX, within thirty (30) Calendar Days after the final Phase II Interconnection Study report, or the Facilities Study report (or System Impact Study report if the Facilities Study is waived), the applicable Participating TO shall tender

- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Formatted: Highlight
- Comment [SS23]: This should be the applicable section that addresses IC elections within 10 BDs of the Phase I Results Meeting.
- Formatted: Highlight
- Comment [SS24]: Consistent with the concept of self-prioritization. As LSA indicated earlier, LSA favors addressing this element of self-prioritization in the tariff and not in the BPMs, so the tariff and BPM provisions do not contradict each other.
- Formatted: Highlight
- Formatted: Highlight

Interconnection Process Enhancements are highlighted yellow. Language currently pending on compliance with FERC is shaded grey. All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

a draft GIA, together with draft appendices. The draft GIA shall be in the form of the FERC-approved form of GIA set forth in CAISO Tariff Appendix ~~FEE~~ or Appendix ~~CGFF~~, as applicable. The Interconnection Customer shall provide written comments, or notification of no comments, to the draft appendices to the applicable Participating TO(s) and the CAISO within (30) calendar days of receipt.

- Formatted: Highlight
Formatted: Highlight
Formatted: Highlight
Formatted: Highlight

13.1.2 Consistent with Sections ~~45.3 and~~ 13.1.1, when the transmission system of a Participating TO, in which the Point of Interconnection is not located, is affected, such Participating TO shall tender a separate agreement, in the form of the GIA, as appropriately modified.

13.2 Negotiation

Notwithstanding Section 13.1, at the request of the Interconnection Customer, the applicable Participating TO(s) and CAISO shall begin negotiations with the Interconnection Customer concerning the appendices to the GIA at any time after the CAISO provides the Interconnection Customer with the final Phase II Interconnection Study report. The applicable Participating TO(s) and CAISO and the Interconnection Customer shall negotiate concerning any disputed provisions of the appendices to the draft GIA for not more than one hundred twenty (120) calendar days after the CAISO provides the Interconnection Customer with the final Phase II Interconnection Study report, or the Facilities Study report (or System Impact Study report if the Facilities Study is waived). If the Interconnection Customer determines that negotiations are at an impasse, it may request termination of the negotiations at any time after tender of the draft GIA pursuant to Section 13.1 and request submission of the unexecuted GIA with FERC or initiate Dispute Resolution procedures pursuant to Section 15.5. If the Interconnection Customer requests termination of the negotiations, but, within one hundred twenty (120) calendar days after issuance of the final Phase II Interconnection Study report, fails to request either the filing of the unexecuted GIA or initiate Dispute Resolution, it shall be deemed to have withdrawn its Interconnection Request. Unless otherwise agreed by the Parties, if the Interconnection Customer has not executed and returned the GIA, requested filing of an unexecuted GIA, or initiated Dispute Resolution procedures pursuant to Section 15.5 within one hundred twenty (120) calendar days after issuance of the final Phase II Interconnection Study report, it shall be deemed to have withdrawn its Interconnection Request. The applicable Participating TO(s) and CAISO shall provide to the Interconnection Customer a final GIA within fifteen ten (1510) Business Days after the completion of the negotiation process and receipt of all requested information.

- Formatted: Highlight
Formatted: Highlight
Formatted: Highlight
Formatted: Highlight
Formatted: Highlight

15.1.1 Scope

Confidential Information shall not include information that the receiving Party can demonstrate: (1) is generally available to the public other than as a result of a disclosure by the receiving Party; (2) was in the lawful possession of the receiving Party on a non-confidential basis before receiving it from the disclosing Party; (3) was supplied to the receiving Party without restriction by a third party, who, to the knowledge of the receiving Party after due inquiry, was under no obligation to the disclosing Party to keep such information confidential; (4) was independently developed by the receiving Party without reference to Confidential Information of the disclosing Party; (5) is, or becomes, publicly known, through no wrongful act or omission of the receiving Party or breach of the GIA; or (6) is required, in accordance with Section 15.1.6, Order of Disclosure, to be disclosed by any Governmental Authority or is otherwise required to be disclosed by law or subpoena, or is necessary in any legal proceeding establishing rights and obligations under the GIDAP. Information designated as Confidential Information will no longer be

Interconnection Process Enhancements are highlighted yellow. Language currently pending on compliance with FERC is shaded grey. All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

deemed confidential if the Party that designated the information as confidential notifies the other Parties that it no longer is confidential.

15.7 Change In CAISO Operational Control

If the CAISO no longer has control of the portion of the CAISO Controlled Grid at the Point of Interconnection during the period when an Interconnection Request is pending, the CAISO shall transfer to the applicable former Participating TO or successor entity which has ownership of the Point of Interconnection any amount of the deposit or payment with interest thereon that exceeds the cost that it incurred to evaluate the request for interconnection. Any difference between such net deposit amount and the costs that the former Participating TO or successor entity incurs to evaluate the request for interconnection shall be paid by or refunded to the Interconnection Customer, as appropriate. The CAISO shall coordinate with the applicable former Participating TO or successor entity which has ownership of the Point of Interconnection to complete any Interconnection Study, as appropriate, that the CAISO has begun but has not completed. If the Participating TO, CAISO has tendered a draft GIA to the Interconnection Customer but the Interconnection Customer has neither executed the GIA nor requested the filing of an unexecuted GIA with FERC, unless otherwise provided, the Interconnection Customer must complete negotiations with the applicable former Participating TO or successor entity which has the ownership of the Point of Interconnection.

Formatted: Highlight
Formatted: Highlight

Appendix 1 Interconnection Request
INTERCONNECTION REQUEST

Provide three one copies copy of this completed form pursuant to Section 7 of this Appendix 1 below.

- c. Type of project (i.e., gas turbine, hydro, wind, etc.) and general description of the equipment configuration (if more than 4one type is chosen include net-nameplate MW for each);

Table with 2 columns: Technology, Nameplate. Rows include Cogeneration, Reciprocating Engine, Biomass, Steam Turbine, Gas Turbine, Wind, Hydro, Photovoltaic, Combined Cycle.

Other (please describe):

General description of the equipment configuration (e.g. number, size, type, etc):

Interconnection Process Enhancements are highlighted yellow. Language currently pending on compliance with FERC is shaded grey. All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

- d. Proposed In-Service Date (first date transmission is needed to the facility), Trial Operation date and Commercial Operation Date by month, day, ~~month~~, and year and term of service (dates must be sequential); _____

Proposed Trial Operation Date: _____
Proposed Commercial Operation Date: _____
Proposed Term of Service (years): _____

- e. Name, address, telephone number, and e-mail address of the Interconnection Customer's contact person (primary person who will be contacted);

Name: _____
Title: _____
Company Name: _____
Street Address: _____
City, State: _____
Zip Code: _____
Phone Number: _____
Fax Number: _____
Email Address: _____
DUNS Number: _____

- f. Approximate location of the proposed Point of Interconnection (i.e., specify transmission facility interconnection point name, voltage level, and the location of interconnection);

- g. Interconnection Customer data (set forth in Attachment A)

The Interconnection Customer shall provide to the CAISO the technical data called for in Attachment A to this Interconnection Request. Three (3) copies are required.

5. Applicable deposit amount made payable to California ISO. Send check to CAISO (see section 7 below for details) along with the:
Interconnection Request for processing.
Attachment A (Interconnection Request Generating Facility Data).
6. Evidence of Site Exclusivity as specified in the GIDAP and name(s), address(es) and contact information of site owner(s) (check one):

_____ Is attached to this Interconnection Request
_____ Deposit in lieu of Site Exclusivity attached, Site Exclusivity will be provided at a later date in accordance with this GIDAP

* * *

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

Interconnection Request

Attachment A Generating Facility Data

GENERATING FACILITY DATA

Provide three copies of this completed form.

1. Provide ~~two one set of original prints and one reproducible copy~~ (no larger than 3611" x 2417") or soft copy on cd/flashdrive of the following:

- A. Site drawing to scale, showing generator location and Point of Interconnection with the CAISO Controlled Grid.
- B. Single-line diagram showing applicable equipment such as generating units, step-up transformers, auxiliary transformers, switches/disconnects of the proposed interconnection, including the required protection devices and circuit breakers. For wind and photovoltaic generator plants, the one line diagram should include the distribution lines connecting the various groups of generating units, the generator capacitor banks, the step up transformers, the distribution lines, and the substation transformers and capacitor banks at the Point of Interconnection with the CAISO Controlled Grid.

* * *

12. Load Flow and Dynamic Models:

Provide load flow model for the generating plant and its interconnection facilities in GE PSLF *.epc format, including new buses, generators, transformers, interconnection facilities. An equivalent model is required for the plant with generation collector systems. This data should reflect the technical data provided in this Attachment A.

For each generator, governor, exciter and power system stabilizer, select the appropriate dynamic model from the General Electric PSLF Program Manual and provide the required input data. For inverter based generating facilities, select the appropriate generator and control models from the General Electric PSLF Program Manual and provide the required input data. Include any user written *.p EPCL files to simulate inverter based plants' dynamic responses (typically needed for inverter based PV/wind plants). Provide a completed *.dyd file that contains the information specified in this section. One copy of this data should be provided on DVD, CD, or USB flash drive media.

If you require assistance in developing the models, we suggest you contact General Electric. Accurate models are important to obtain accurate study results. Costs associated with any changes in facility requirements that are due to differences between model data provided by the generation developer and the actual generator test data, may be the responsibility of the generation developer.

* * *

Appendix 3

GENERATOR INTERCONNECTION STUDY PROCESS AGREEMENT
FOR QUEUE CLUSTERS

* * *

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

- 1.0 When used in this Agreement, with initial capitalization, the terms specified shall have the meanings indicated in the CAISO's FERC-approved Generation Interconnection Procedures in CAISO Tariff Appendix DD "GIDAP" or the Master Definitions Supplement, Appendix A to the CAISO Tariff, as applicable.

- 4.0 The Interconnection Studies will be based upon the technical information provided by the Interconnection Customer in the Interconnection Request, as may be modified as the result of the Scoping Meeting, subject to any modifications in accordance with Section 6.7.1 of the and modifications to the proposed Commercial Operation Date of the Generating Facility permitted by the GIDAP. The CAISO reserves the right to request additional technical information from the Interconnection Customer as may reasonably become necessary consistent with Good Utility Practice during the course of the Interconnection Studies. If the Interconnection Customer modifies its designated Point of Interconnection, Interconnection Request, or the technical information provided therein is modified, the Interconnection Studies may be modified as specified in the GIDAP.

- 13.5 Rules of Interpretation. This Agreement, unless a clear contrary intention appears, shall be construed and interpreted as follows: (1) the singular number includes the plural number and vice versa; (2) reference to any person includes such person's successors and assigns but, in the case of a Party, only if such successors and assigns are permitted by this Agreement, and reference to a person in a particular capacity excludes such person in any other capacity or individually; (3) reference to any agreement (including this Agreement), document, instrument or tariff means such agreement, document, instrument, or tariff as amended or modified and in effect from time to time in accordance with the terms thereof and, if applicable, the terms hereof; (4) reference to any applicable laws and regulations means such applicable laws and regulations as amended, modified, codified, or reenacted, in whole or in part, and in effect from time to time, including, if applicable, rules and regulations promulgated thereunder; (5) unless expressly stated otherwise, reference to any Article, Section or Appendix means such Article or Section of this Agreement or such Appendix to this Agreement, or such Section of the GIDAP or such Appendix to the GIDAP, as the case may be; (6) "hereunder", "hereof", "herein", "hereto" and words of similar import shall be deemed references to this Agreement as a whole and not to any particular Article, Section, or other provision hereof or thereof; (7) "including" (and with correlative meaning "include") means including without limiting the generality of any description preceding such term; and (8) relative to the determination of any period of time, "from" means "from and including", "to" means "to but excluding" and "through" means "through and including".

Appendix A

ASSUMPTIONS USED IN CONDUCTING THE PHASE I INTERCONNECTION STUDY

The Phase I Interconnection Study will be based upon the information set forth in the Interconnection Request and agreed upon in the Scoping Meeting held on _____, subject to any modifications in accordance with Section 6.2 of the GIDAP, and the following assumptions:

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

* * *

Appendix B

* * *

Level of Deliverability: Choose one of the following:

_____ Energy Only

_____ Full Capacity

_____ Partial Capacity for _____ MWs

* * *

Appendix 4

**AGREEMENT FOR THE ALLOCATION OF RESPONSIBILITIES WITH REGARD TO
GENERATOR INTERCONNECTION PROCEDURES AND INTERCONNECTION STUDY
AGREEMENTS**

* * *

- 3.8** Use of Contractors: Nothing in this Agreement shall prevent either the CAISO or the PTO from using qualified, mutually agreed upon third party contractors to meet that Party's rights or obligations under this Agreement or the GIDAP. To promote the efficiency of the process, the CAISO and PTO will collaborate to identify a list of the mutually agreed to qualified contractors available to the Parties.

* * *

Appendix 6

GIDAP AGREEMENT FOR INDEPENDENT STUDY PROCESS

* * *

- 4.0** The Interconnection Studies will be based upon the technical information provided by the Interconnection Customer in the Interconnection Request, as may be modified as the result of the Scoping Meeting, subject to any modifications in accordance with Section 6.1.2 of the GIDAP and modifications to the proposed Commercial Operation Date of the Generating Facility permitted by the GIDAP. The CAISO reserves the right to request additional technical information from the Interconnection Customer as may reasonably become necessary consistent with Good Utility Practice during the course of the Interconnection Studies. If the Interconnection Customer modifies its designated Point of Interconnection, Interconnection Request, or the technical information provided therein is modified, the Interconnection Studies may be modified as specified in the GIDAP.

Interconnection Process Enhancements are highlighted **yellow**.
Language currently pending on compliance with FERC is shaded **grey**.
All other proposed changes are for clarifying purposes.

FOR DISCUSSION PURPOSES ONLY

* * *

Appendix FF

Small Generator Interconnection Agreement for Interconnection Requests Processed Under the Generator Interconnection and Deliverability Allocation Procedures

* * *

3.4.5 Modification of the Small Generating Facility

Prior to making any modifications to the Small Generating Facility, the Interconnection Customer must **first request that the CAISO evaluate whether such modification is a Material Modification and** receive written authorization from the Participating TO and the CAISO **before making any change to the Small Generating Facility that may have a material impact on the safety or reliability of the CAISO Controlled Grid or the Participating TO's electric system.** Such authorization shall not be unreasonably withheld. Modifications shall be done in accordance with Good Utility Practice. **The CAISO may engage the services of the applicable Participating TO to assess the modification, in which case such costs shall be borne by the party making the request under Section 6.7.2 of Appendix DD, and such costs shall be included in any CAISO invoice for modification assessment activities.** If the Interconnection Customer makes such modification without the Participating TO's and the CAISO's prior written authorization, the Participating TO or the CAISO shall have the right to temporarily disconnect the Small Generating Facility. **Any change to the Point of Interconnection, except those deemed acceptable under this article of the GIDAP SGIA or so allowed elsewhere, shall constitute a Material Modification. The Interconnection Customer may then withdraw the proposed modification or proceed with a new Interconnection Request for such modification.**

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

* * *

Interconnection Process Enhancements are highlighted yellow.
Language currently pending on compliance with FER is shaded grey.
All other proposed changes are for clarifying purposes.