

## Stakeholder Comments Template

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

Submitted by	Company	Date Submitted
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This template was created to help stakeholders structure their written comments on topics detailed in the July 5, 2011 *Revised Draft Final Proposal for Generation Interconnection Procedures 2 (GIP 2) Proposal* (at <http://www.caiso.com/2b21/2b21a4fe115e0.html>).

We ask that you please submit your comments in MS Word to [GIP2@caiso.com](mailto:GIP2@caiso.com) *no later than the close of business on July 14, 2011* so that there will be time to include them in Board documents.

Your comments will be most useful if you provide the reasons and the business case for your preferred approaches to these topics.

Please also respond to the question “Do you support the proposal?” for each item listed below.

**Comments on topics listed in GIP 2 Draft Final Proposal:**

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

Comments:

At the Work Group meeting for this topic, there was some un-certainty whether Fast Track projects qualified to apply for Deliverability Assessment through the Annual Full Capacity Deliverability process, as outlined in GIP tariff, Section 8.2. LS Power's interpretation is that provisions under this tariff section are available to all Energy Only projects, including Fast Track projects. LS Power requests CAISO to confirm this. If not, LS Power recommends CAISO to revise this Section of the tariff thereby providing Fast Track projects a mechanism to convert to Full Capacity. We see no reason why tariff section 8.2 provisions should not be available to Fast Track projects when these are available to all other types of Energy Only projects. Without this option being available to Fast Track projects, there is no other mechanism in CAISO tariff that would allow a Fast Track project to convert to Full Capacity.