

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 April 14, 2011 *Straw Proposal for Generation Interconnection Procedures 2 (GIP 2) Proposal* (at <http://www.caiso.com/2b21/2b21a4fe115e0.html>). We ask that you please submit your comments in MS Word to GIP2@caiso.com no later than the close of business on May 5, 2011.

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

Your input will be particularly valuable to the extent you can provide greater definition and clarity to each of the proposals as well as concerns you may have with implementation or effectiveness.

Comments on topics listed in GIP 2 Straw Proposal:**Work Group 2**

8. Information provided by the ISO (Internet Postings)

Comments:

MID appreciates the opportunity to comment on the ISO's *Generation Interconnection Procedures 2 (GIP 2) Proposal*. MID believes that coordination with Affected Systems, as currently implemented and expressed in the ISO Tariff, is not adequate for Affected Systems to accurately understand the impacts of proposed interconnection projects on the Affected Systems and needs improvement. This concern is amplified in the cluster process, where, even when an overall cluster impact on an Affected System is determined, it is difficult to determine which potential Interconnection Customer is causing what portion of the impact to any particular Affected System. MID believes the cause for much of the confusion within the cluster process is that key facets of ISO tariff provisions concerning Affected System coordination are hold-overs from the prior, serial interconnection process, where projects were considered one-by-one, and Affected Systems could have an opportunity to assess impacts to them on an Interconnection Customer-by-Customer basis. The current Tariff provisions make it very difficult, if not impossible, for Affected Systems to coordinate with Interconnection Customers, as the ISO may prefer, given the number of such customers and the lack of transparency as to which Interconnection Customer(s) are causing what adverse impact, and the amount of impact caused by each Interconnection Customer discovered to be causing such impacts.

Proper coordination by the ISO with Affected Systems is essential so that 1) Affected Systems may have input into the study process in accordance with reliability standards, 2) Interconnection Customers have an accurate idea of the costs necessary to mitigate adverse impacts, and 3) the process minimizes delays that would otherwise result if Interconnection Customers in a cluster would need to have their projects separately studied by an Affected System.

Accordingly, proper notification by the ISO to Affected Systems is essential, including in Phase 1 of the cluster study process. Notification should be made to neighboring Transmission Planners (as that term is defined by the North American Electric Reliability Corporation (NERC)), as well as Affected Systems that the ISO identifies on its own, to ensure that no party is overlooked. The ISO should ensure that such measures are included in language developed and incorporated into the ISO Tariff.

Comments Template for April 14, 2011 Straw Proposal

After notification of Affected Systems and neighboring Transmission Planners,¹ the ISO should ensure that the Phase 1 study process and communications with Affected Systems and neighboring Transmission Planners comply with Western Electricity Coordinating Council (WECC) and NERC Reliability Standards, policies and procedures. Such coordination should ensure that the ISO incorporates technical information provided by Affected Systems and neighboring Transmission Planners into ISO study processes. The ISO should provide generator interconnection studies promptly to Affected Systems and neighboring Transmission Planners through a secure website.

Other Comments:

1. Provide comments on proposals submitted by stakeholders.
2. If you have other comments, please provide them here.

If applicable, see comments submitted as to Working Group 2, Subject Matter 8.

¹ Neighboring Transmission Planners may eventually become classified as Affected Systems.