

Stakeholder Comments Template

Submitted by	Company	Date Submitted
James McFall, (209) 526-7521, JamesM@mid.org ; or Sean Neal, (916) 498-0121, smn@dwgp.com	Modesto Irrigation District	February 7, 2018

Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Issues Paper posted on January 17, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due February 7, 2018 by 5:00pm

The issue paper posted on January 17, 2018 and the presentation discussed during the January 24, 2017 stakeholder meeting can be found on the CAISO webpage at the following link:
<http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>

Please use this template to provide your written comments on the Issue Paper topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Issue Paper for convenience.

Comments:

The Modesto Irrigation District (“MID”) thanks the CAISO for the opportunity to provide written comments on the topics presented in the Issue Paper posted on January 17, 2018 as part of the 2018 Interconnection Process Enhancements (“IPE”) Initiative. In these comments, MID only responds to the topic of Affected System Options. MID reserves the right to comment on any other matter that is part of or becomes part of the 2018 IPE Initiative.

4. Deliverability

- 4.1 Transmission Plan Deliverability Allocation
- 4.2 Balance Sheet Financing
- 4.3 Participating in the Annual Full Capacity Deliverability Option
- 4.4 Change in Deliverability Status to Energy Only
- 4.5 Energy Only Projects’ Ability to Re-enter the CAISO Queue for Full Capacity
- 4.6 Options to Transfer Deliverability
- 4.7 Transparency on Availability of Deliverability
- 4.8 Commercial Viability Criteria – Continuous Compliance Obligation
- 4.9 Interim Deliverability Status
- 4.10 Effective Load Carrying Capacity
- 4.11 Cancellation or Delay of CAISO Approved Transmission Projects

5. Energy Storage

- 5.1 Distributed Energy Resources
- 5.2 Replacing Entire Existing Generator Facilities with Storage

5.3 Deliverability Assessment for Energy Storage Facilities

6. Generator Interconnection Agreements

6.1 Suspension Notice

6.2 Affected Participating Transmission Owner

6.3 Clarify New Resource Interconnection Requirements

6.4 Ride-through Requirements for Inverter based Generation

6.5 Affected System Options

The CAISO 2018 IPE Issue Paper discusses a stakeholder proposal to change the manner in which coordination with Affected Systems is conducted. See IPE Paper at 26. Specifically, the CAISO notes a proposal for the “inclusion of CAISO-system options to mitigate adverse affected system impacts identified in CAISO interconnection studies.” *Id.* The CAISO observes that this proposal “intends to eliminate or reduce the need to deal with separate affected system study timelines,” and to address certain questions regarding financial impacts to interconnecting generators as a result of coordination with Affected Systems. MID agrees with the CAISO’s position as expressed in the Issue Paper to not include Affected Systems Options within the scope of the 2018 IPE Initiative. See *id.*

MID concurs with the CAISO’s observation that “The CAISO interconnection studies do not identify impacts on other electric systems and are not an alternative to affected system studies required by other electric systems.” *Id.* The CAISO does not have the data, nor does it have as complete an understanding of the Affected Systems’ operations and infrastructure as the Affected Systems Operators themselves, to conduct full studies of potential impacts of interconnecting generators on the CAISO-Controlled Grid to Affected Systems. MID agrees with the CAISO that the CAISO’s interconnection studies may not always identify adverse Affected System impacts, and agrees with the CAISO that the CAISO’s interconnection studies do not and will not eliminate or reduce the need for Affected System studies. See *id.*

MID actively participated in the stakeholder processes leading up to the present Tariff and Business Practice Manual (“BPM”) provisions that set forth the requirements for notification and confirmation of Affected Systems concerns for the CAISO and Affected System Operators. MID continues to believe that the present system provides a reasonable balance of considerations regarding Affected Systems, from prompting the early coordination of Affected System Operators and customers interconnecting to the

CAISO-Controlled Grid to recognition of the unique data and operations of an Affected System. Accordingly, MID urges the CAISO to allow interconnecting generators, Participating Transmission Operators and neighboring electric systems to continue to use the still relatively new rules governing Affected Systems identification and mitigation of impacts and to reject inclusion of Affected System Options within the scope of the 2018 IPE Initiative.

6.6 Modeling Data Requirements

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

7.2 ITCC for Non-cash Reimbursement Network Upgrade Costs

7.3 Financial Security Postings and Non-Refundable Amounts

7.4 Queue Clearing Measures

7.5 Shared SANU and SANU Posting Criteria Issues

7.6 Clarification on Posting Requirements for PTOs

7.7 Reliability Network Upgrade Reimbursement Cap

7.8 Reimbursement for Network Upgrades

8. Interconnection Request

8.1 Study Agreement

8.2 Revisions to Queue Entry Requirements

8.3 Master Planned Projects (Open Ended and Serial Projects)

8.4 Project Name Publication

8.5 Interconnection Request Application Enhancements

8.6 FERC Order No. 877

9. Modifications

9.1 Timing of Technology Changes

9.2 Commercial Viability – PPA Path Clarification

9.3 PPA Transparency

9.4 Increase Repowering and Serial Re-Study Deposit

9.5 Clarify Measure for Modifications After COD

9.6 Short Circuit Duty Contribution Criteria for Repower Projects

9.7 Material Modification for Parked Projects

10. Additional Comments