

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the 2015 Interconnection Process Enhancements (IPE) Revised Draft Final Proposal that was posted on August 27, 2015 and as supplemented by the presentation and discussion during the September 3, 2015 stakeholder meeting.

Submit comments to InitiativeComments@caiso.com

[Comments are due September 17, 2015 by 5:00pm](#)

The Draft Final Proposal posted on August 27, 2015 may be found at:

<http://www.caiso.com/Documents/RevisedDraftFinalProposal-InterconnectionProcessEnhancements2015.pdf>

The presentation discussed during the September 3, 2015 stakeholder meeting may be found

at: <http://www.caiso.com/Documents/AgendaandPresentation-InterconnectionProcessEnhancements2015-RevisedDraftFinalProposal.pdf>

For each topic that was modified in the Revised Draft Final Proposal please select one of the following options to indicate your organization's overall level of support for the CAISO's proposal:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Topic 1 – Affected Systems

The Modesto Irrigation District (“MID”) thanks the CAISO for its continued efforts in this stakeholder process and for revising its July 6, 2015 Draft Final Proposal. In particular, MID supports the CAISO’s insertion of the sentence, “An Affected System’s mitigation remedies that may be available outside the CAISO Tariff are unaffected by this provision.” MID believes that the added language will help clarify that the CAISO Tariff does not supersede Affected Systems’ mitigation rights in venues outside of the CAISO, such as the Federal Energy Regulatory Commission, North American Electric Reliability Corporation, Western Electricity Coordinating Council, or in civil court. As the CAISO recognized in its September 3, 2015 stakeholder meeting, the CAISO Tariff cannot impose obligations on entities that are not subject to the CAISO Tariff or supersede third-party agreements. With this revision, MID is able to state that it does not oppose the CAISO’s Revised Draft Final Proposal for Topic 1 on Affected Systems.

Although MID does not oppose the Revised Draft Final Proposal in its current form, MID believes that the proposal would benefit from a non-substantive, clarifying edit. Because of the heightened interest from stakeholders on this issue, the CAISO has made several rounds of edits to its original proposal in response to concerns identified during the comment process. While this approach has succeeded in producing a balance of compromises, MID notes one instance where a brief adjustment in language could help clarify the intent. Accordingly, MID proposes the following revision (changes are indicated in underline and strikethrough):

If an electric system operator comes forward after the established timeline as an Affected System, absent the Affected System identifying a legitimate reliability issue that the CAISO will confirm, the CAISO will not delay the synchronization or Commercial Operation of the Generating Facility due to a mitigation required by the Affected System. The CAISO will work with the Affected System and Interconnection Customer to establish temporary mitigations if possible for the identified reliability issue. In this case, ~~A~~any mitigation the Affected System Operator feels is necessary will be the responsibility of the Affected System and not the CAISO, the Participating Transmission Owner(s), or the Interconnection Customer. The CAISO may waive this timeline and deem the electric system operator as an Identified Affected System if (i) the CAISO failed to identify the Affected System; or (ii) if the Interconnection Customer modifies its project such that an electric system operator becomes a potentially Affected System.

As shown above, the proposed revision does not impact the substance of the CAISO's proposal but merely clarifies that an Affected System will be responsible for the cost of mitigation only if the Affected System fails to come forward by the established timeline and is not able to satisfy one of the specified waivers of this timeline. MID understands that adjustment reflects the CAISO's intent, and believes the context of the other language in the instant paragraph, as well as other Tariff sections confirm such intent, but believes that such adjustment will be helpful to stakeholders and the CAISO. Accordingly, MID requests that the CAISO edit its proposal to include this non-substantive, clarifying edit.

Topic 2 – Time-In-Queue Limitations