

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Interconnection Process Enhancements Issue Paper posted on June 3 and as supplemented by the presentation and discussion during the June 11 stakeholder web conference.

Submit comments to GIP@caiso.com

[Comments are due June 25, 2013 by 5:00pm](#)

The Issue Paper posted on June 3 may be found at:

<http://www.caiso.com/Documents/IssuePaper-InterconnectionProcessEnhancements.pdf>

The presentation discussed during the June 11 stakeholder web conference may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancementsJun11_2013.pdf

Following each of the 15 topics presented below, the ISO poses specific questions and requests that stakeholders respond to each.

Topic 1 – Future downsizing policy

1. What is the demand for a second downsizing opportunity? Would a second downsizing opportunity be sufficient, or do stakeholders believe that there will be further demand beyond a second downsizing opportunity?

NRG would like to see at least a second downsizing opportunity for projects in all interconnection clusters prior to Cluster 5, and would support regular ongoing downsizing opportunities, subject to restrictions such as a limited request window.

2. What are stakeholders' views on the ISO's position that a downsizing request window of limited time duration should be utilized in any future downsizing opportunity?

NRG does not object to downsizing windows of limited duration, especially if the CAISO provides regular downsizing opportunities, assuming that the downsizing windows provide a reasonable opportunity to submit downsizing requests.

3. The ISO believes that funneling downsizing requests through such a window permits ISO and PTO transmission planning engineers to evaluate the collective impacts of all downsizing requests in the most efficient manner possible (in contrast to the inefficiency and associated chaos of having to review the impacts of downsizing requests sequentially, at any time that an interconnection customer chooses to submit such a request). Similarly, expansion of the ability to downsize through a “material modification” review would essentially allow downsizing requests to be submitted at any time and would thus present the same problems. What are stakeholders’ views on this?

NRG understands the CAISO’s preference for considering downsizing requests in a “cluster”, and does not object to this approach.

4. To the extent there were a need for additional downsizing opportunities,
 - a. what would be the optimal frequency of downsizing request windows? For example, one per year or one every two years?

One per year.

- b. how many downsizing request windows do stakeholders believe should be considered?

NRG supports regular windows for at least some period of time. If and when the number of downsizing requests cease, the need for a regular request windows can be re-examined.

- c. what should be the timing of a downsizing request window? The ISO suggests that the timing of a downsizing request window should be such that there is sufficient time to validate the requests received and study their combined impacts at the same time the re-assessment study is conducted in accordance with the GIDAP timeline. What are stakeholders’ views on that?

NRG supports that approach.

5. Please comment on the ISO’s position that future downsizing options should be limited to pre-Cluster 5 customers because the GIDAP already provides certain opportunities to downsize projects that were not available under the GIP.

NRG is especially interested in ensuring downsizing opportunities for pre-Cluster 5 projects and does not object to the CAISO’s position on this issue.

6. Stakeholders are asked to comment on other important features of the current one-time downsizing opportunity. For example, customers who are affected by but are not downsizing should be protected. As an additional example, downsizing projects should bear the costs of the downsizing study and any resulting interconnection agreement amendments.

7. What are stakeholders' views on the continued use of the non-conforming partial termination provisions as a future downsizing option? Although the ISO does not view this as a generally applicable downsizing option, do stakeholders view its continued availability as critical?

Topic 2 – Disconnection of first phase of project for failure of second phase

No comment.

1. Please expand on the explanation of how current risk of disconnection affects project financeability and viability.
2. Stakeholders are asked to suggest potential ways to reduce risk for developers, short of blanket elimination of ISO termination rights.
3. Please suggest what alternative, equitable non-termination remedies to GIA default might look like.
4. Please comment on the proposed modification to the safe harbor to “greater of 5% or 10 MW.

Topic 3 – Clarify tariff and GIA provisions related to dividing up GIAs into multiple phases or generating projects

No comment.

1. Are there additional scenarios beyond the three scenarios described on page 29 of the issue paper?
2. What thresholds should be used in allowing projects to be broken into multiple phases?
3. Should there be a minimum total MW size threshold to be eligible to divide a project into phases? For example, would it make sense to allow a 5 MW project to be split into smaller phases?
4. Should there be a maximum number of phases into which a project can be divided?
5. Should there be a minimum MW size for each phase?
6. Should criteria be imposed that include both a minimum total MW threshold and a minimum phase size in MW or a percentage of the total project?
7. When during the interconnection process should an IC be allowed to request to implement a phased structure for its project?

Topic 4 – Improve Independent Study Process

1. Are you interested in participating in the ISP working group and able to devote significant time outside of the standard Interconnection Process Enhancement stakeholder process?

No.

2. If yes, are you interested in the policy aspects, technical aspects or both?
3. Do you have an interest in the behind the meter expansion component of the ISP and if so, please summarize your thinking on revisions to the behind the meter expansion component?

NRG would be interested in an ISP that allows for such expansion, especially in the context of adding BTM storage to a project that would increase the amount of hours (but not the amount of instantaneous output) that a solar project could provide energy.

Topic 5 – Improve Fast Track

1. Are you interested in participating in the FT working group and able to devote significant time outside of the standard Interconnection Process Enhancement stakeholder process?
No.
2. If yes, are you interested in the policy aspects, technical aspects or both?
3. Are you able to provide engineering expertise for developing FT screens related to a networked transmission system?

Topic 6 – Provide for ability to charge customer for costs to process a material modification request

1. Should the cost for modification requests be a fixed fee or deposit and actual costs incurred be charged against deposit?
NRG does not support charging interconnection customers for Material Modification Assessments. The costs of such assessments should be paid for out of moneys already paid, including forfeited deposit fees.
2. Should existing study funds be used for modification assessments?
Yes.
3. If a separate deposit is made, should it be refunded at the end of that modification assessment or once the project achieves COD?
At the end of the modification assessment.

Topic 7 – COD modification provision for small generator projects

1. Do stakeholders agree that small generators should be afforded a similar mechanism to modify their project as a large generator?
Yes.
2. Should small generators be allowed to change their POI if the change does not impact other queued projects and there is a benefit for making that change?
Yes.

3. Should small generators be allowed to modify their project during the study process?

Yes, if there is no material impact.

4. Should small generators be allowed to extend their commercial operation date for three years from the COD in their interconnection request would be deemed not material, similar to Section 4.4.5 of Appendix U for larger generators?

Yes.

Topic 8 – Length of time in queue provision for small generator projects

1. Should small generator have the same time to develop their project as a large generator (i.e. 7 years)? If no, what should the length of time be for the developer of a small generator?

Yes.

Topic 9 – Clarify that PTO and not ISO tenders GIA

1. Do stakeholders have a concern with amending the tariff to be consistent with existing implementation?

No.

2. If yes, what are those concerns and how would the stakeholder propose to resolve those concerns?

Topic 10 – Timeline for tendering draft GIAs

1. Do stakeholders have an issue with changing the trigger for tendering of GIAs?

No.

Topic 11 – LGIA negotiations timeline

No comment.

1. Do Stakeholders agree with the best effort language?
2. If Stakeholders agree with triggering the tendering of agreements off of the Results Meeting, do you agree with triggering the negotiation off of the same event?
3. Do Stakeholders want to change the 15 BD to 10 BD for providing a final GIA for execution? If yes, do Stakeholders agree that the information request sheet must be provided in advance of finalizing the negotiation?
4. Are Stakeholders concerned with the process of required written agreement from all three parties on extending the tendering and negotiation timeline as a proxy for prioritization? If yes, then what prioritization process would you propose given the questions discussed above?

Topic 12 – Consistency of suspension definition between serial and cluster

No comment.

1. With the narrow focus of ensuring that other queue projects are not impacted if a serial project suspends, are stakeholders still concerned with the topic?
2. Are stakeholders willing to accept the consequences if a serial project suspends and then impacts the ability for later queue projects to achieve their COD?
3. Are stakeholders willing to accept the consequences if a serial project suspends and then impacts the ability for later queue projects to achieve their full capacity deliverability status?
4. Do you have a better idea to mitigate this risk for later queue projects?

Topic 13 – Clarity regarding timing of transmission cost reimbursement

No comment.

1. What are stakeholders' views on going forward whether cost reimbursement should require both commercial operation and network upgrades in service?

Topic 14 – Distribution of forfeited funds

No comment.

1. If some stakeholders believe that the scheduling coordinator approach should be abandoned, then do stakeholders have any specific ideas for alternative approaches to the distribution of forfeited funds?
2. Please comment on the possible use of forfeited IFS funds to offset resulting cost increases for projects remaining in queue as a way to mitigate impacts of withdrawals on other interconnection customers.
3. Please comment on the stakeholder-suggested idea of applying forfeited IFS funds to a PTO's transmission revenue requirement to reduce the transmission access charge and thereby benefit ratepayers who ultimately bear the costs of the transmission upgrades.
4. Please comment on the possible use of forfeited funds by the ISO and PTO for study costs previously incurred that an interconnection customer defaults on.

Topic 15 – Inverter/transformer changes

No comment.

1. The ISO believes that it should be more transparent with respect to its material modification review including which modifications are allowed without a review. What modifications do stakeholders believe should be made without a material modification review?
2. If a formal material modification review is not made, what type of notification process would stakeholders envision should be implemented so that the ISO and PTO are aware of the changes?