

January 24, 2011

Submitted by email to the CAISO at regionaltransmission@caiso.com

Submitted By	Company	Date
Michael Tartibi	NRG Solar, LLC ("NRG Solar")	January 24, 2012

RE: Comments of NRG Solar LLC on the CAISO's "Generation Interconnection Procedures: Deliverability Requirements for Clusters 1 & 2 – Revised Discussion Paper"

NRG Solar submits these comments in response to the CAISO's January 10th document "Generation Interconnection Procedures: Deliverability Requirements for Clusters 1 & 2 – Revised Discussion Paper" (Paper), and the discussion about the Paper at the January 17th stakeholder meeting. The Paper proposes revisions to the Cluster 1-Cluster 2 (C1/C2) Phase II Study, and corresponding changes to the methodology for the upcoming Cluster 3-Cluster 4 (C3/C4) Phase II Study.

NRG Solar believes CAISO is on a right track to revise the interconnection study approach and strongly supports the CAISO's approach in changing the deliverability costs for projects associated with clusters 1 to 4. For the purpose of delivery analysis, it is very reasonable to lower the number of projects in a certain area to a more practical number so the upgrade requirements and their associated costs are more pragmatic. NRG Solar has noticed that amongst all DNU's for the SCE's Eastern Bulk System (as shown in the following table) only the 500/200 kV transformer will remain for the new assessment.

Table C – Delivery Network Upgrades (\$ 1,000)		
1	Colorado River – Red Bluff No.3 500 kV T/L	\$158,158
2	Red Bluff – Valley 500 kV T/L	\$909,364
3	500/220 kV No.2 Transformer Bank at Red Bluff 500 kV Sub	\$71,698
4	Loop Lugo – Mohave 500 kV T/L into Pisgah 500 kV Sub with series capacitors on the Nipton – Pisgah and Mohave – Pisgah lines	\$278,373
Total Cost		\$1,139,593

Since for the new assessment CAISO will reduce the total MWs associated with new generation in a certain area (such as Desert Area), the DNU's could be significantly different from the original ones. Because of this NRG Solar suggests that (1) the \$100 million threshold be reduced to a value between \$50 and \$70 and (2) for the purpose of new assessment remove all DNU's (do not only limit it to transmission lines) above 200 kV with this cost threshold.

If a significant non-transmission DNU with a voltage level above 200 kV is not removed in the new assessment, the new assessment cannot determine if this DNU will actually be required under the new conditions (reduced MWs).