

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Draft Final Proposal posted on November 13, 2018.

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due December 6, 2018 by 5:00pm**

***(updated from December 3 during the stakeholder meeting)***

The draft final proposal posted on November 13, 2018 and the presentation discussed during the November 20, 2018 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.

## 7. Interconnection Financial Security and Cost Responsibility

### 7.1 Maximum Cost Responsibility for NUs and Potential NUs

PG&E is supportive of the methodology outlined in the 2018 IPE Addendum to Draft Final Proposal (hereinafter “2018 IPE Addendum”) as it relates to Maximum Cost Responsibility (MCR) for Network Upgrades and Potential Network Upgrades. PG&E feels that this proposal will balance the needs of the PTOs and the generation customers. PG&E applauds the CAISO for their efforts on this complicated issue.

Specifically, PG&E feels that this proposal provides clarity and transparency to generation customers by clearly defining the terms associated with cost responsibility and outlining the allocation process of upgrades to generation customers. Further, the addition of the defined term, Maximum Cost Exposure (MCE), the sum of all directly assigned network upgrades (ANU) and conditionally assigned network upgrades (CANU), provides generation customers additional visibility on costs that might not otherwise be known.

PG&E supports the change of the trigger for removing a CANU from the execution of a project’s Interconnection Application (IA) to the submission of its third Interconnection Financial Security (IFS) postings to the PTO. PG&E feels that this will encourage generation projects that are commercially viable to move ahead with their generation projects while protecting the PTOs from time and resource investments in projects that are not viable.

***Specific Question regarding the establishment of the Maximum Cost Exposure (MCE).  
Would stakeholders prefer:***

***(1) the MCE remain established at the true cost exposure of a project that demonstrates the ultimate cost the project could be responsible for when taking into consideration potential system changes, without opportunity for reduction?***

**OR**

***(2) the MCE could be adjusted downward with the MCR, but could ultimately go back up if system changes occur, similar to how the MCR can increase pursuant to Appendix DD, Section 7.4?***

PG&E prefers the first option above, where the MCE remains established at the true cost exposure of a project without opportunity for reduction. By keeping the true cost exposure of the project static, the MCE provides generation customers a clear indication of their total

potential project interconnection costs. Allowing the MCE to be dynamic would render it less transparent.

## 10. Additional Comments

## 11. New Topics – Interconnection Request Acceptance and Validation Criteria

### 11.1 Interconnection Request Acceptance

PG&E supports the Interconnection Request Acceptance criteria described in the 2018 IPE Addendum. PG&E also observed that Interconnection Requests have large amounts of missing, incorrect data, or models which do not function, which makes the validation process time consuming and challenging for both PG&E and the CAISO. Requiring that all deposits, documents, and models have been submitted as part of an interconnection request will reduce the validation timelines observed by all parties. Thus, allowing the PTO and the CAISO to review complete interconnection requests without negatively affecting the review and acceptance of credible interconnection requests.

Lastly, PG&E suggests changing the below statement found on Page 17, Section 11.1, Item 10 to clarify the existing language:

*“10) Plot showing flat run and bump test (fault at bus and clear after 4-6 cycles) from the PSLF must be submitted”*

### 11.2 Validation Criteria

PG&E supports the Interconnection Request Validation Criteria described in this 2018 IPE Addendum. The increasing number and complexity of interconnection requests over the past few clusters has made it more challenging for PG&E to assist customers through the validation process. PG&E supports the CAISO’s proposal to extend the validation deadline (i.e., from May 31 to June 30) along with removing the requirement that scoping meetings be held only after an interconnection request is deemed valid. PG&E is supportive because this will provide parties more flexibility and time to validate the large number and/or complexity of the interconnection requests prior to the June 30<sup>th</sup> deadline. PG&E supports the addition of a day-for-day extension for individual interconnection requests past the June 30<sup>th</sup> deadline when the CAISO and PTOs exceed their response timeline. This proposal provides generation customers flexibility when the CAISO and PTOs struggle to meet tariff timelines.