



## Comments of Pacific Gas and Electric Company Clusters 1 & 2 Deliverability

Submitted by	Company	Date Submitted
<i>Elijah Gilfenbaum GXEO@pge.com</i>	<i>Pacific Gas and Electric Company (PG&amp;E)</i>	<i>November 9, 2011</i>

PG&E applauds the CAISO's proactive approach to identifying potential cost-savings opportunities for transmission customers and bottlenecks that could delay the deliverability for projects IOUs might be contracting with. PG&E sees significant value in the CAISO providing a comprehensive look at these interconnection queue dynamics to all market participants (even if only at the aggregated level) given that it has the most complete view of interconnection information and early study results.

PG&E offers the following suggestions for how the types of information contained in this discussion paper could be most useful.

- The CAISO should provide market participants with a list of queue ID numbers that make up the 13,500 MWs of projects identified in this paper. While geographic information on IC requests is publicly available on the CAISO's secure site, the assumptions embedded within the interconnection studies that were conducted to identify which projects will contribute to the need for a particular network upgrade is not completely transparent.
- The CAISO should provide market participants with a mapping of [submitted PPAs](#) from the CPUC website to correlate with the 13,500 MWs of projects in this analysis.
- The CAISO should follow up with stakeholders after the post-Phase 2 posting deadline to inform market participants whether a sufficient number of projects chose to withdraw to obviate the need for the network upgrades in question.
- The CAISO should give market participants some idea of how they plan to address a scenario where an insufficient number of projects choose to withdraw after the Phase 2 posting deadline so that the upgrades in question continue to be needed.
- After the post-Phase 2 posting deadline, the CAISO should reevaluate the assumptions for the Clusters 3 & 4 Phase 2 analysis. If significant network upgrades are no longer needed due to the number of withdrawn projects, then those lines should not be part of the base case for the Cluster 3 & 4 analysis.