

## Stakeholder Comments Template

### Subject: Small and Large Generator Interconnection Procedures Draft Final Proposal and Meeting

Submitted by	Company	Date Submitted
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CDWR/SWP appreciates the opportunity to comment on CAISO's Small and Large Generator Interconnection Procedures Draft Final Proposal and Meeting. This process provides a useful forum for parties to voice their concerns, an opportunity to gain a more comprehensive understanding of the issues, and to develop solutions that will streamline the generator interconnection procedure. The procedure will be shorter, more efficient, and more equitable.

#### Overall Assessment of the ISO Proposal:

This stakeholder process is moving in the right direction and the framework is good. Based on the evolving dynamic policies driving the need for renewables energy it is important to note this is a change process that may need further modification in the future.

#### Fast Track for Generation Less than 2 MW

In general SWP is supportive of the Fast Track Proposal. Based on comments presented at the June and July stakeholder meetings by CAISO staff, IOU's staff, and others supporting the Fast Track proposal, it seems logical that these generators will have no impact on generators in the cluster queue. The two main reasons for these generators to receive special treatment are: 1) at the location where the generator will be built an electrical connection already exists, and 2) load exists in close proximity to consume the energy.

SWP is supportive of increasing the MW size limitation if the developer is able to demonstrate to CAISO transmission planner the proposed generator will not result in a need to build new or require upgrade to existing transmission lines.

Independent Study Processing Track

In general, SWP supports CAISO's Independent Study Processing Track Proposal. Those generators that are found to have no impact on generators in the cluster queue may qualify for the independent study process, which shortens the timeline length when compared to generators in the cluster queue.

Consideration should be given to include generators that are "behind the meter" for qualification for the independent study, fast track, or some modified expedited process. Similar to projects qualifying for the independent study track, "behind the meter" projects that are that are found to have no impact on generators in the cluster queue should also be deemed qualified. Alternatively, if "behind the meter" generators can show that local load is present and an electrical connection already exists, they should also qualify for the fast track or some other expedited process.