

Stakeholder Comments Template

Subject: Remote Resource Interconnection Policy

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the following topics covered in the June 1 Market Notice regarding Remote Resource Interconnection Policy. Upon completion of this template please submit (in MS Word) to chinman@caiso.com. Submissions are requested by close of business on Friday June 15, 2007.

Please submit your comments to the following questions for each topic in the spaces indicated.

1. What is the minimum percentage of capacity of eligible projects that must be subscribed pursuant to executed Large Generator Interconnection Agreements before construction can commence?

Sempra believes that the minimum should be 25% vs. 30% (i.e. the lower of the CAISO Petition's 25%-30% proposal) to ensure a smaller project or a group of small projects (typical of renewable resources) coming on-line first will have the opportunity to benefit from a potential Multi-User Resource Trunkline that connects constrained resources to the grid.

2. What are the appropriate criteria for demonstrating "additional interest" (i.e., interest more than the requisite minimum percentage of LGIAs) for an eligible project?

Completion of specific/key milestones within the permitting process (e.g. CEC).

3. What is the minimum percentage of "additional interest" that should be shown for an eligible project before construction can commence?

Since any proposed Multi-User Resource Trunkline will be 'sized' to access a large quantity of location restrained resources, the "additional interest" minimum percentage seems appropriate at the lower end of the CAISO Petition's of 25%-30% proposal.

Do wheel-through customers receive benefits from a Remote Resource Interconnection Facility?

Yes. Because it is not possible to determine whether any specific project will engage in

‘wheel through’ transactions at some point in time (i.e. determined by market conditions) and also because once the Interconnection is fully utilized, it is paid for by the generators and the transmission rate-payers no longer carry the cost responsibility.

4. Should the costs of a Remote Resource Interconnection Facility be included in wheel-through rates? Why or why not?

No. Because delivery to the “sink” whether inside the CAISO or outside should remain separate from Interconnection issues and cost.

5. What are the key elements of and considerations for a transmission planning process for the Remote Resource Interconnection Policy?

n/c

6. What principles should be applied and factors considered to ensure that a proposed Remote Resource Interconnection Facility will result in a cost effective and efficient interconnection of resources to the grid?

n/c

7. How should Energy Resource Areas be selected?

n/c

8. Should the CAISO consider tariff changes to its existing authority to "cluster" interconnection studies to enhance its ability to efficiently evaluate locationally-constrained resource areas

The current CAISO tariff language (shown below) seems adequate to include evaluation of locationally-constrained resource areas.

4.2 Clustering.

At the ISO's option, and in coordination with the applicable Participating TO(s), Interconnection Requests may be studied serially or in clusters for the purpose of the Interconnection System Impact Study.

Clustering shall be implemented on the basis of Queue Position. If the ISO elects, in coordination with applicable Participating TO(s), to study Interconnection Requests using Clustering, all Interconnection Requests received within a period not to exceed one hundred and eighty (180) Calendar Days, hereinafter referred to as the “Queue Cluster Window” shall be studied together without regard to the nature of the underlying Interconnection Service. The deadline for completing all Interconnection System Impact Studies for which an Interconnection System Impact Study Agreement has been executed during a Queue Cluster Window shall be in accordance with LGIP Section 7.4, for all Interconnection Requests assigned to the same Queue Cluster Window. The ISO may agree to conduct the study of an Interconnection Request separately to the extent warranted by Good Utility Practice based upon the electrical remoteness of the proposed Large Generating Facility.

Clustering Interconnection System Impact Studies shall be conducted in such a manner to ensure the efficient implementation of the applicable regional transmission expansion plan in light of the transmission system's capabilities at the time of each study.

The Queue Cluster Window shall have a fixed time interval based on fixed annual opening and closing dates. Any changes to the established Queue Cluster Window interval and opening or closing dates shall be announced with a posting on the ISO Home Page beginning at least one hundred and eighty (180) Calendar Days in advance of the change and continuing thereafter through the end date of the first Queue Cluster Window that is to be modified.

9. Other

n/c