

## Revised Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this revised template to provide your comments on the Interconnection Process Enhancements Draft Final Proposal for Topics 1 and 2 posted on September 12 and as supplemented by the presentations and discussion during the September 19 stakeholder web conference, and the September 24 amendment to the draft final proposal.

Submit comments to [GIP@caiso.com](mailto:GIP@caiso.com)

**[Comments are due Monday, October 7, 2013 by 5:00pm](#)**

Stakeholders are asked to base their comments on all of the following documents:

1. The Draft Final Proposal posted on September 12 which may be found at:

[http://www.caiso.com/Documents/DraftFinalProposal\\_Topics\\_1-2\\_InterconnectionProcessEnhancements.pdf](http://www.caiso.com/Documents/DraftFinalProposal_Topics_1-2_InterconnectionProcessEnhancements.pdf)

2. The presentation discussed during the September 19 stakeholder web conference which may be found at:

[http://www.caiso.com/Documents/Agenda\\_Presentation-InterconnectionProcessEnhancements-DraftFinalProposal\\_Topics1-2.pdf](http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancements-DraftFinalProposal_Topics1-2.pdf)

3. Supplemental presentation slides amending the September 12 draft final proposal's approach to downsizing study costs and discussed during the September 19 stakeholder web conference which may be found at:

[http://www.caiso.com/Documents/SupplementalPresentation-InterconnectionProcessEnhancements-DraftFinalProposal\\_Topics1-2.pdf](http://www.caiso.com/Documents/SupplementalPresentation-InterconnectionProcessEnhancements-DraftFinalProposal_Topics1-2.pdf)

4. The September 24 amendment to the September 12 draft final proposal which may be found at:

[http://www.caiso.com/Documents/Addendum-DraftFinalProposal\\_Topics\\_1-2\\_InterconnectionProcessEnhancements.pdf](http://www.caiso.com/Documents/Addendum-DraftFinalProposal_Topics_1-2_InterconnectionProcessEnhancements.pdf)

Based on all the documents referenced above, please provide your comments on each of the topics listed below.

**Topic 1 – Future downsizing policy**

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 1:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Sempra USGP supports the proposal with qualifications. After initially proposing to promptly refund deposits for unneeded transmission upgrades, the CAISO now proposes in the Addendum to provide refunds at the next financial posting, consistent with the GIDAP process. The CAISO indicates that the one-time procedure that was used for immediate refunds after the first downsizing process was time and resource intensive, and that the CAISO does not want to repeat such a process every year following the annual downsizing process and the GIDAP reassessment.

The interval between the downsizing study and the next financial posting can in some cases be on the order of several years. While Sempra USGP acknowledges the ongoing burden that an annual posting adjustment process represents, a more timely refund of deposits serves to reduce development costs and thereby benefits customers generally. On this basis, the CAISO should continue to consider developing an efficient automated mechanism to make posting adjustments consistent with the results of the downsizing process and prior to the next scheduled financial posting.

**Topic 2 – Disconnection of completed phase(s) of project due to failure to complete subsequent phase**

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 2:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Sempra USGP supports the CAISO’s proposal with qualifications. The CAISO proposal is for generators that fail to construct their full project capacity to either enter the downsizing process by the project COD, or forfeit the pro-rata share of upgrade costs (absent certain exceptions<sup>1</sup>). However, a gap in the process may exist after the prior downsizing window closes and before the project COD. In some cases, projects may not have secured contracts for the full requested interconnection capacity by the time the prior downsizing window closes. To avoid this gap, the CAISO should extend opening of the next downsizing window to just after the prior downsizing window closes. In this way, a project retains the ability to enter a downsizing process in the event that contracting efforts fail to be fully successful any time before COD.

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<sup>1</sup> Draft Final Proposal at page 34-35.