

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Bonnie S. Blair bblair@thompsoncoburn.com 202.585.6900 Margaret E. McNaul mmcnaul@thompsoncoburn.com 202.585-6900	Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities")	July 19, 2013

Please use this template to provide your comments on the Interconnection Process Enhancements Draft Final Proposal for Topics 6-12 posted on July 2 and as supplemented by the presentation and discussion during the July 10 stakeholder web conference.

Submit comments to GIP@caiso.com

Comments are due July 19, 2013 by 5:00pm

The Draft Final Proposal for Topics 6-12 posted on July 2 may be found at:

http://www.caiso.com/Documents/DraftFinalProposal_Topics6-12_InterconnectionProcessEnhancements.pdf

The presentation discussed during the July 10 stakeholder web conference may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancementsJul10_2013.pdf

Following each topic listed below, the ISO poses specific questions and requests that stakeholders respond to each.

Topic 6 – Provide for ability to charge customer for costs to process a material modification request

Please select one of the following options to indicate your organization's overall level of support for the proposal on Topic 6:

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.

Level of Support: (2)

The Six Cities support the ISO's proposal on Topic 6, subject to one qualification. Specifically, the ISO proposes that, once the modification request is completed, the "interconnection customer will receive an accounting of the actual costs spent and a refund of any excess funds." The draft final proposal for this topic, however, does not expressly provide for the ISO to invoice an interconnection customer for actual costs spent in excess of \$10,000. Consistent with the ISO's proposal that interconnection customers are liable for all actual costs associated with a material modification request (charged against a \$10,000 deposit), if actual costs exceed the deposit amount and additional amounts are owed, the interconnection customer should be invoiced for such costs following completion of the modification request. The Six Cities believe that this is the ISO's intent based upon discussions during the July 10th stakeholder call. Finally, the Six Cities reserve the right to comment on proposed revisions to the ISO Tariff to implement the draft final proposal.

Topic 7 – COD modification provision for small generator projects

Please select one of the following options to indicate your organization's overall level of support for the proposal on Topic 7:

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.

Level of Support: (1)

The Six Cities support treating small generators comparably to large generators as proposed by the ISO, but reserve the right to comment on proposed revisions to the ISO Tariff to implement the draft final proposal.

Topic 8 – Length of time in queue provision for small generator projects

Please select one of the following options to indicate your organization's overall level of support for the proposal on Topic 8:

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.

Level of Support: (1)

As stated above with respect to Topic 7, the Six Cities support treating small generators comparably to large generators as proposed by the ISO, but reserve the right to comment on proposed revisions to the ISO Tariff to implement the draft final proposal.

Topic 9 – Clarify that PTO and not ISO tenders GIA

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 9:

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.

Level of Support: (1)

The ISO’s proposal to specify that PTOs (rather than the ISO) tender draft GIAs is reasonable, and the Six Cities do not oppose this ministerial change, but reserve the right to comment on proposed revisions to the ISO Tariff to implement this clarification.

Topic 10 – Timeline for tendering draft GIAs

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 10:

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.

Level of Support: (1)

The ISO’s proposal to trigger the tendering of the GIA off of the Results Meeting is reasonable, and the Six Cities do not oppose this change, but reserve the right to comment on proposed revisions to the ISO Tariff to implement the draft final proposal.

Topic 11 – LGIA negotiations timeline

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 11:

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.

Level of Support: (1)

The ISO’s proposal to trigger the negotiation period for the GIA off of the Results Meeting appears to be reasonable and is consistent with the change being proposed above under Topic 10. The Six Cities do not oppose this change, but reserve the right to comment on proposed revisions to the ISO Tariff to implement the draft final proposal.

Topic 12 – Consistency of suspension definition between serial and cluster

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 12:

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.

Level of Support: (1)

The Six Cities support the draft final proposal, because it is intended to ensure that project suspensions by serial interconnection customers may not adversely impact other projects through delays in the completion of network upgrades that are shared with those other projects. The Six Cities also support the ISO’s proposal to implement this change for projects that are currently in the queue but are lacking a “substantially negotiated” GIA. The Six Cities reserve the right to comment on proposed revisions to the ISO Tariff to implement the draft final proposal.

Other comments

Stakeholders are asked to comment on any other aspects of the Draft Final Proposal for Topics 6-12 for which they would like to provide comments.