

**COMMENTS ON BEHALF OF
THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA ON
THE DRAFT TARIFF LANGUAGE FOR TOPICS 6 THROUGH 12 OF THE
INTERCONNECTION PROCESS ENHANCEMENTS INITIATIVE**

In response to the ISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") submit the following comments on the ISO's draft tariff language for the Interconnection Process Enhancements initiative, posted on July 15, 2013.

1. Comments on Multiple Tariff Provisions Related to Topic 6

The ISO proposes revisions to various provisions of the ISO Tariff to require, consistent with the Draft Final Proposal for Topic 6, that interconnection customers pay the actual costs of evaluating and processing modification requests. The affected Tariff sections include the following:

- 25.1.2
- Appendix S, § 1.3.4.1
- Appendix T, § 3.4.5
- Appendix U, § 4.4.3
- Appendix Y, § 6.9.2.2
- Appendix DD, § 6.7.2.2
- Appendix FF, § 3.4.5

The revisions to address Topic 6 in each of the Tariff provisions listed above are substantially the same, and generally provide as follows:

The CAISO *may engage* the services of the applicable Participating TO to assess the modification, *in which case* costs for both the Participating TO and CAISO shall be borne by the party making the request . . .

See, e.g., App. S, § 1.3.4.1 (emphasis added).

As drafted, the proposed language appears to require an interconnection customer to pay the ISO's costs of evaluating the modification only if the ISO elects to involve the relevant Participating TO in the analysis. On the other hand, the Six Cities understand the Draft Final Proposal to provide for interconnection customers proposing modifications to pay the full cost of evaluating their modification requests, irrespective of whether the costs are incurred by the ISO or the Participating TO working jointly or individually to assess the request. For clarity, the Six Cities suggest that the ISO consider the following revisions:

The CAISO may engage the services of the applicable Participating TO to assess the modification, ~~in which case~~ costs for ~~both the CAISO and for~~ the Participating TO ~~(if any) and CAISO~~ shall be borne by the party making the request . . .

This revision will clarify that customers seeking review of modifications are required to pay the ISO's costs to process their requests regardless of whether the ISO has sought to involve the Participating TO in the assessment. While such a circumstance may arise infrequently, the Six Cities believe that the revision reflected in these comments will avoid any confusion as to the circumstances in which interconnection customers are responsible for the cost of processing modification requests.

2. Appendix Y, Section 11.1.1

A word has been inadvertently deleted from Appendix Y, Section 11.1.1:

Within thirty (30) Calendar Days after the Interconnection Customer has its Results Meeting . . .

Submitted by,

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