

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Meg McNaul mmcnaul@thompsoncoburn.com 202.585.6940	The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California	Dec. 10, 2018
Bonnie Blair bblair@thompsoncoburn.com 202.585.6905		

Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Draft Final Proposal posted on November 13, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due December 6, 2018 by 5:00pm
(updated from December 3 during the stakeholder meeting)

The draft final proposal posted on November 13, 2018 and the presentation discussed during the November 20, 2018 stakeholder meeting can be found on the CAISO webpage at the following link:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>

Please use this template to provide your written comments on the Issue Paper topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Issue Paper for convenience.

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

Specific Question regarding the establishment of the Maximum Cost Exposure (MCE).
Would stakeholders prefer:

- (1) the MCE remain established at the true cost exposure of a project that demonstrates the ultimate cost the project could be responsible for when taking into consideration potential system changes, without opportunity for reduction?

OR

- (2) the MCE could be adjusted downward with the MCR, but could ultimately go back up if system changes occur, similar to how the MCR can increase pursuant to Appendix DD, Section 7.4?

The Six Cities support the CAISO's proposed approach with respect to the revised definitions and components of and adjustments to the Maximum Cost Responsibility and Maximum Cost Exposure as outlined in the Addendum. With respect to the question posed above, the Six Cities observe that maintaining the Maximum Cost Exposure at the true potential cost exposure of the project, without adjustment downward (as described in Option (1) above), is likely to provide greater certainty and may minimize controversy regarding potential financing exposure that could occur if the Maximum Cost Exposure is adjusted upward and downward with the Maximum Cost Responsibility.

10. Additional Comments

Not applicable.

11. New Topics – Interconnection Request Acceptance and Validation Criteria

11.1 Interconnection Request Acceptance

The Six Cities do not have comments on this topic at this time.

11.2 Validation Criteria

The Six Cities do not have comments on this topic at this time.