

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Interconnection Process Enhancements (IPE) Revised Straw Proposal for Topics 3-5 and 12-15 posted on November 8 and as supplemented by the presentation and discussion during the November 18 stakeholder meeting.

Submit comments to GIP@caiso.com (with the exception of comments on Topic 15 draft BPM language posted on November 18—see below)

[Comments are due December 6, 2013 by 5:00pm](#)

The Revised Straw Proposal for Topics 3-5 and 12-15 posted on November 8 may be found at:

http://www.caiso.com/Documents/RevisedStrawProposal_Topics3-5_12-15_InterconnectionProcessEnhancements.pdf

The presentation discussed during the November 18 stakeholder meeting may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-RevisedStrawProposal-InterconnectionProcessEnhancementsTopics3-5_12-15.pdf

Please provide your comments on the ISO’s proposal for each of the topics listed below.

[Topic 3 – Clarify tariff and GIA provisions related to dividing up GIAs into multiple phases or generating projects](#)

Note: The ISO asks stakeholders to provide feedback on the commercial reasons they need phasing, what the minimum megawatt amount and maximum number of phases allowed might be, and whether limits such as those proposed in the revised straw proposal can meet the needs of

stakeholders. For example, if you believe that more liberal limits are needed than the limits proposed by the ISO in the revised straw proposal, please provide the proposed limits and the commercial/business justification. Also, as discussed with stakeholders during the November 18 web conference, the ISO is willing to consider allowing phasing after a project has reached its commercial operation date, but wishes to understand from developers the need for such a provision.

Comments: ***The Six Cities continue to support the ISO's proposal to retain the requirement for the owners of a phased, multi-owner project to assume joint and several liability for all of the obligations relating to the interconnection as specified in the GIA. The Six Cities have no comments regarding the remaining aspects of the ISO's proposal for this topic at this time.***

Topic 4 – Improve Independent Study Process

Note: For those elements of the straw proposal presented as draft tariff changes, please provide general comments at this time in lieu of line-edit suggestions to the tariff language.

Comments: ***The Six Cities have no position on the ISO's straw proposal for this topic at this time.***

Topic 5 – Improve Fast Track

Note: For those elements of the straw proposal presented as draft tariff changes, please provide general comments at this time in lieu of line-edit suggestions to the tariff language.

Comments: ***The Six Cities have no position on the ISO's straw proposal for this topic at this time.***

Topic 12 – Consistency of suspension definition between serial and cluster

Note: As described in the November 8 revised straw proposal and discussed during the November 18 web conference, this topic has been withdrawn.

Topic 13 – Clarify timing of transmission cost reimbursement

Note: In addition to general comments on the straw proposal for this topic, stakeholders are also asked to provide example scenarios to help illustrate any questions/issues that they may have on reimbursement for in-service upgrades, multiple reimbursement periods, and posting versus billing.

Comments: ***As stated in their previous comments, eligibility for cost reimbursement for phased and non-phased projects should require both (i) that the project have achieved commercial operation and (ii) that the required network upgrades are in service. The Six***

Cities understand that the ISO's proposal to provide for cost reimbursement upon COD and the earlier of either the in-service date for the associated network upgrades or two years represents an attempt to address concerns relating to timely completion of network upgrades by Participating TOs and avoid retention of interconnection customer funding for an unreasonably long period of time following the in-service date of the generating facility. However, it is not clear that the proposed two year period will, by itself, incentivize timely completion of upgrades to the extent that failure to do so is, in fact, an issue and, moreover, the selection of two years appears to be arbitrary. Further, as discussed in the Straw Proposal, the Commission has stated that network upgrades should be in-service prior to any reimbursement. (See Straw Proposal at 44, citing Cal. Indep. Sys. Operator Corp., 138 FERC ¶ 60,060, at P 53 (2012).)

With respect to the ISO's proposal to apply any changes on a going forward basis to customers in the first cluster in which all projects have not yet received a proposed interconnection agreement, the Six Cities do not object to that approach. The Six Cities also do not object to the proposal to provide reimbursement for those network upgrades that are in service upon the COD even though other upgrades may not be.

Topic 14 – Distribution of forfeited funds

Note: Two alternative straw proposals are presented in the November 8 revised straw proposal for stakeholder consideration. The ISO requests stakeholder to comment on the pros and cons and their preferences for either of these alternatives.

Comments: **The Six Cities strongly support the ISO's efforts to modify its current method for allocating forfeited funds. As proposed by the ISO, either approach – either allocating the funds to Participating TOs to offset the high voltage transmission access charge as in Option A or utilizing those funds to offset the impact of project withdrawals on customers remaining in the queue and Participating TOs as in Option B would provide benefits to ratepayers. The Six Cities observe that the Option A approach appears to be administratively convenient, although tariff modifications are likely required in order to allow the TRBA to be used to pass through the forfeited funds to ratepayers. To the extent that the ISO elects to adopt Option B, the Six Cities would support allocating any underutilized surplus to Participating TOs in accordance with Option A. The ISO's final proposal on this topic, if Option B is adopted, should make clear that forfeited funds used for network upgrades will not be subject to reimbursement. The Six Cities believe that this is the ISO's intent, and their support for the Option B approach is contingent on this clarification.**

Topic 15 – Material modification requests (formerly “Inverter/transformer changes”)

Note: On November 18 the ISO posted draft Business Practice Manual (BPM) language regarding the modification process. The ISO is requesting written stakeholder comments on the draft BPM language by 5pm December 9, 2013. Please submit written comments on the draft BPM language to QueueManagement@caiso.com.