Stakeholder Comments Template

Subject: Modifications to the Small Generator Interconnection Procedures Issues Paper and Meeting

Submitted by	Company	Date Submitted
Dariush Shirmohammadi *dariush@shirconsultants.com* *310-858-1174*	*California Wind Energy Association (CalWEA)*	*April 27, 2010*

This template was created to help stakeholders submit written comments on topics related to the April 1, 2010 Modifications to the Small Generator Interconnection Procedures Issue Paper and April 12, 2010 Small Generator Interconnection Procedures Stakeholder Meeting. Please submit comments and thoughts (in MS Word) to dkirrene@caiso.com no later than the close of business on April 27, 2010.

The ISO is interested in knowing the importance and urgency of the issues identified through this stakeholder process. The issues identified below are further described in the Issues Paper. Please rate the importance of each issue as high, medium or low by checking the check box. In addition, please identify the urgency for getting each of the identified issues resolved. Check the urgent check box for issues that should be resolved in a FERC filing this year. Check the not urgent check box if the issue could be resolved beyond year-end. The information provided will assist the ISO in determining the scope of this stakeholder effort.

Study Process Issues		
	Importance	**Urgency**
2.1.1 Time required for the SGIP study process	☐ high ☒ medium ☐ low	☐ urgent ☒ not urgent
2.1.2 SGIP serial study process coordination with the studies under the large generation interconnection procedures (LGIP)	☒ high ☐ medium ☐ low	☒ urgent ☐ not urgent
2.1.3 Avoiding delays caused by the increasing volume of SGIP projects	☒ high ☐ medium ☐ low	☐ urgent ☒ not urgent
2.1.4 Detail and necessity of the feasibility study	☐ high ☒ medium ☐ low	☐ urgent ☒ not urgent

2.1.5 Interconnection request data requirements	☐ high X medium ☐ low	☐ urgent X not urgent
2.1.6 Should the SGIP accommodate re-studies?	☐ high X medium ☐ low	☐ urgent X not urgent
2.1.7 Availability of the current base case data for use by project developers	X high ☐ medium ☐ low	X urgent ☐ not urgent
2.1.8 Delays and uncertainty in study results caused by projects that withdraw	X high ☐ medium ☐ low	X urgent ☐ not urgent
Comments:	The uncertainty in timing and cost responsibility of SGIP projects are the two biggest issues in need of resolution.	
Solution Ideas:	Allow a low cost study option for 20 MW or smaller projects in LGIP. The deposit should be reduced to $50K for these projects. SGIP projects that seek cost certainty and/or deliverability status would use this category. Study project that choose to stay in the existing SGIP process as it is done today. Consider eliminating one of the annual LGIP queue cluster windows and Phase 1 studies to free up resources for SGIP studies. If SGIP study for a project starts ahead of an LGIP Phase 1 or Phase 2 study, complete the SGIP study as if the LGIP cluster does not exist.	
Deliverability Issues Related to Interconnecting Small Generation		
2.2.1 Should SGIP have an option for deliverability?	X high ☐ medium ☐ low	X urgent ☐ not urgent
2.2.2 Should there be an opportunity to have "partial deliverability"?	X high ☐ medium ☐ low	X urgent ☐ not urgent
2.2.3 Should there be a later opportunity to change deliverability status after generator is commercially operational?	X high ☐ medium ☐ low	X urgent ☐ not urgent
2.2.4 How would a change in policy affect existing generation and/or existing projects in the queue?	☐ high X medium ☐ low	☐ urgent X not urgent
Comments:	• The deliverability status/level of currently operating projects should be left untouched and equal to the level specified in their existing Interconnection Facilities Agreement (IFA). Even the reduction of local load should not be used to change the deliverability level for	

	the purpose of RA calculation. • Projects currently operating under SGIA and those that are already in the SGIP queue should be allowed to request partial deliverability and be studied for that purpose as part of a special study. These projects should be studied for the level of requested deliverability and post deposit equal to their network upgrade cost in order to be deemed deliverable at that level. Every existing project with SGIA and those that are already in the SGIP queue should be given one opportunity to adjust their deliverability. • New SGIP projects who want to be deliverable would should use the proposed Small Generator (≤20 MW) option of LGIP.			
Solution Ideas:	See above for a combination of issue/answers in the deliverability area.			
Issues relating to Cost Certainty				
2.3.1 Developers desire cost certainty	X high ☐ medium ☐ low		X urgent	☐ not urgent
2.3.2 How to minimize the impacts caused by projects that drop out of the queue?	X high ☐ medium ☐ low		X urgent	☐ not urgent
2.3.3 Accuracy of the per unit construction cost estimates	☐ high ☐ medium X low		☐urgent	X not urgent
2.3.4 Effects of adding cost certainty measures to the overall SGIP timeline	X high ☐ medium ☐ low		X urgent	☐ not urgent
Comments:	Cost certainty is important and could be gained by projects using the proposed Small Generation (≤20 MW) feature of the LGIP.			
Solution Ideas:				
Issues related to Eligibility Criteria				
2.4.1 LGIP projects broken up into multiple SGIP projects	☐ high X medium ☐ low		☐urgent	X not urgent
2.4.2 Real vs. Speculative projects	☐ high X medium ☐ low		☐urgent	X not urgent
2.4.3 Generation MW size	☐ high X medium ☐ low		☐urgent	X not urgent
2.4.4 MW Increases to existing projects	☐ high X medium ☐ low		☐urgent	X not urgent
2.4.5 Site Control	X high ☐ medium ☐ low		X urgent	☐ not urgent
Comments:	The site control requirement for SGIP projects should be made			

	consistent with the site control of LGIP projects.	
Solution Ideas:		
Issues related to application and study fees		
2.5.1 Appropriateness of amount	☐ high ☐ medium X low	☐ urgent X not urgent
Comments:	The fees for project that do not want to use the small generation (≤20 MW) option of LGIP should remain the same.	
Solution Ideas:		
Small Generator Interconnection Agreement Issues		
2.6.1 Pace of SGIA completion	☐ high X medium ☐ low	☐ urgent X not urgent
2.6.2 Detail of the SGIA	☐ high X medium ☐ low	☐ urgent X not urgent
Comments:		
Solution Ideas:		
Miscellaneous SGIP tariff issues		
2.7.1 Detail of the SGIP tariff	☐ high ☐ medium X low	☐ urgent X not urgent
2.7.2 Clarity of SGIP tariff definitions	☐ high ☐ medium X low	☐ urgent X not urgent
Comments:	The simplicity of SGIP tariff should remain.	
Solution Ideas:		
Additional Issues that should be considered		
Please include additional issues here.	☐ high ☐ medium ☐ low	☐ urgent ☐ not urgent
Comments:		
Solution Ideas:		

Do you have any additional comments that you would like to provide?