Stakeholder Comments Template

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

Submitted by	Company	Date Submitted
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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	X high ☐ medium ☐ low	X urgent ☐ not urgent
2.1.2 SGIP serial study process coordination with the studies under the large generation interconnection procedures (LGIP)	X high ☐ medium ☐ low	X urgent ☐ not urgent
2.1.3 Avoiding delays caused by the increasing volume of SGIP projects	X high ☐ medium ☐ low	X urgent ☐ not urgent
2.1.4 Detail and necessity of the feasibility study	☐ high X medium ☐ low	☐ urgent X 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:	Any modifications of the process that extends the time required for the SGIP study process would be an extreme negative outcome to this process, even if this is an unintentional outcome. Each potential modification should be considered in the potential impact on extending the time required. The uncertainty in timing and cost responsibility of SGIP projects are the two biggest issues that need to be addressed.	
Solution Ideas:	Each potential modification should be considered in the potential impact on extending the time required.	

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:	Clear definitions need to be given for RA, FC, and EO. It was evident in the Stakeholders meeting that even PTO's are confused and using different definitions.

Once these terms are defined, a source to help developers make business decisions of these options would be very helpful. | |
| Solution Ideas: | Provide clear definitions for RA, FC, and EO and then provide a source to help developers weigh the business decisions of these options. | |

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 X medium ☐ 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 very important but should not extend the current time required.	
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	☐high X medium ☐ low	☐urgent X 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:		
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:		
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?