

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 Issue Paper posted on June 3 and as supplemented by the presentation and discussion during the June 11 stakeholder web conference.

Submit comments to GIP@caiso.com

[Comments are due June 25, 2013 by 5:00pm](#)

The Issue Paper posted on June 3 may be found at:

<http://www.caiso.com/Documents/IssuePaper-InterconnectionProcessEnhancements.pdf>

The presentation discussed during the June 11 stakeholder web conference may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancementsJun11_2013.pdf

Following each of the 15 topics presented below, the ISO poses specific questions and requests that stakeholders respond to each.

Topic 1 – Future downsizing policy

SunEdison strongly supports an annual downsizing opportunity. The importance of this topic cannot be understated. Increasingly, utilities are executing PPAs for fractions of projects, in some cases leading to the need to reduce the project size. An annual downsizing opportunity—one without unnecessary prerequisites—would allow developers to right-size their projects to the contracted demand. Such downsizing should be allowed to the extent that later-queued projects are not adversely impacted by the change. SunEdison supports LSA’s position on Partial Termination provisions as well, but of paramount importance to SunEdison is the establishment of an annual downsizing opportunity.

Topic 2 – Disconnection of first phase of project for failure of second phase

SunEdison supports LSA's position on this matter. CAISO should allow projects cancel phases if the IC pays the cost of NUs needed by later projects. SunEdison also supports the expansion of the "safe harbor" expansion to the greater of 5% or 10MW.

Topic 3 – Clarify tariff and GIA provisions related to dividing up GIAs into multiple phases or generating projects

SunEdison is open to CAISO clarifying its phasing policy but encourages a solution that does not hinder ICs' ability to phase projects.

Topic 4 – Improve Independent Study Process

(No comment)

Topic 5 – Improve Fast Track

(No comment)

Topic 6 – Provide for ability to charge customer for costs to process a material modification request

SunEdison could accept a reasonable assessment charge.

Topic 7 – COD modification provision for small generator projects

(No comment)

Topic 8 – Length of time in queue provision for small generator projects

SunEdison believes that small projects should be subject to the same rules and similar duration for development timeline as the large projects (with seven years' timeline for development).

Topic 9 – Clarify that PTO and not ISO tenders GIA

This change is acceptable, though SunEdison suggests that LSA encourage CAISO to be proactive in ensuring the PTOs issue GIAs to ICs in a timely fashion. Only by adhering to tariff timelines can projects be moved through the interconnection process at a speed commensurate with the timelines contained in PPAs.

Topic 10 – Timeline for tendering draft GIAs

SunEdison can support this change, but would emphasize that the wait for the GIA draft should be kept as short as possible because reaching the project kickoff meeting as quickly as possible is a critical component of project success.

Topic 11 – LGIA negotiations timeline

SunEdison supports enforcement of the 90-day negotiation period and believes that more stringent Tariff language is fully essential to complete contract negotiations in a timely manner and hence does not support the best effort language.

Topic 12 – Consistency of suspension definition between serial and cluster

SunEdison supports LSA's position that more transparency is desirable to fully understand the criteria used for evaluation of suspension requests.

Topic 13 – Clarity regarding timing of transmission cost reimbursement

(No comment)

Topic 14 – Distribution of forfeited funds

(No comment)

Topic 15 – Inverter/transformer changes

SunEdison agrees that certain changes such as inverter and transformer changes should be immaterial enough that MMA should not be necessary. Additionally, it is recognized that there is a need to enforce MMA timeline.