

Stakeholder Comments - SunEdison

Submitted by	Company	Date Submitted
Bhaskar Ray (bray@sunedison.com) (650) 305-0037 John Joven (jjoven@sunedison.com) (650) 713-9076	SunEdison	October 4, 2013

Please use this revised template to provide your comments on the Interconnection Process Enhancements Draft Final Proposal for Topics 1 and 2 posted on September 12 and as supplemented by the presentations and discussion during the September 19 stakeholder web conference, and the September 24 amendment to the draft final proposal.

Submit comments to GIP@caiso.com

[Comments are due Monday, October 7, 2013 by 5:00pm](#)

Stakeholders are asked to base their comments on all of the following documents:

1. The Draft Final Proposal posted on September 12 which may be found at:

http://www.caiso.com/Documents/DraftFinalProposal_Topics_1-2_InterconnectionProcessEnhancements.pdf

2. The presentation discussed during the September 19 stakeholder web conference which may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancements-DraftFinalProposal_Topics1-2.pdf

3. Supplemental presentation slides amending the September 12 draft final proposal's approach to downsizing study costs and discussed during the September 19 stakeholder web conference which may be found at:

http://www.caiso.com/Documents/SupplementalPresentation-InterconnectionProcessEnhancements-DraftFinalProposal_Topics1-2.pdf

4. The September 24 amendment to the September 12 draft final proposal which may be found at:

http://www.caiso.com/Documents/Addendum-DraftFinalProposal_Topics_1-2_InterconnectionProcessEnhancements.pdf

Based on all the documents referenced above, please provide your comments on each of the topics listed below.

Topic 1 – Future downsizing policy

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 1:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Comments:

SunEdison generally supports the CAISO’s proposal for this topic with some qualifications. These qualifications are addressed in the LSA’s stakeholder comments. The need for flexibility in determining final project size (post Interconnection Request) is extremely important. The annual downsizing policy would allow SunEdison the ability to reduce project size due to evolving factors in project development stages. From potential PPA demands, environmental restrictions, site design, and permitting, the downsizing opportunity would allow SunEdison to correctly size projects when warranted.

Topic 2 – Disconnection of completed phase(s) of project due to failure to complete subsequent phase

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 2:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Comments:

SunEdison generally supports the CAISO's proposal for this topic with some qualifications. These qualifications are addressed in the LSA's stakeholder comments. Although, the CAISO's proposal for Topic 1 should generally address any issues under this Topic 2 proposals. SunEdison and other developers can use the annual downsizing opportunity to cancel project phases or portions if there are any constructability issues. Nevertheless, the CAISO should allow developers to cancel project phases if the Interconnection Customer pays the cost of associated Network Upgrades needed by later queued projects.

SunEdison greatly appreciates the opportunity to comment on CAISO's IPE proposals for Topics 1 and 2. For any questions or follow-up items, please contact John Joven (jjoven@sunedison.com) at 650-713-9076.