

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the 2015 Interconnection Process Enhancements (IPE) Revised Straw Proposal that was posted on May 11, 2015 and as supplemented by the presentation and discussion during the May 18, 2015 stakeholder meeting.

Submit comments to [initiativeComments@caiso.com](mailto:initiativeComments@caiso.com)

[Comments are due June 1, 2015 by 5:00pm](#)

The Revised Straw Proposal posted on May 11, 2015 may be found at:

[http://www.caiso.com/Documents/RevisedStrawProposal\\_InterconnectionProcessEnhancements2015.pdf](http://www.caiso.com/Documents/RevisedStrawProposal_InterconnectionProcessEnhancements2015.pdf)

The presentation discussed during the May 18, 2015 stakeholder meeting may be found at:

[http://www.caiso.com/Documents/Agenda-Presentation\\_InterconnectionProcessEnhancements2015.pdf](http://www.caiso.com/Documents/Agenda-Presentation_InterconnectionProcessEnhancements2015.pdf)

For each topic that was modified in the Revised Straw Proposal please select one of the following options to indicate your organization's overall level of support for the CAISO's proposal:

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.

### Topic 1 – Affected Systems

### Topic 2 – Time-In-Queue Limitations

### Topic 3– Negotiation of Generator Interconnection Agreements

### Topic 5 - Stand-Alone Network Upgrades and Self-Build Option

### Topic 10 - Forfeiture of Funds for Withdrawal During Downsizing Process

sPower opposes this topic. Although sPower provided comments on the initial proposal, it did not address this topic. sPower was under the impression that the initial proposal was simply to clarify that if a downsizing generator withdraws *during* the downsizing study process (i.e. prior to the issuance of a downsizing generator study report), that forfeiture of IFS would revert back to the pre-downsizing MW capacity of the project. It appears in the revised straw proposal and in the meeting on 5/18/2015, that the proposal has been revised such that a downsizing generator will forfeit IFS based upon the pre-downsizing MW capacity regardless of whether the downsizing study report has been issued. This is a major revision to the original proposal (at least in the way it was presented to stakeholders) and has significant financial impacts on generators currently in queue. Currently a generator in queue, if it meets the criteria for partial recovery of IFS, has the ability to use the downsizing process to avoid hundreds of thousands of dollars in forfeited IFS for sole use network upgrades if the PTO has not incurred costs towards them. There is precedent in previous downsizing cycles for this occurrence. Making this revision could result in millions of dollars of forfeited Network Upgrade IFS for projects currently in queue for which the PTO has incurred **zero** costs. It is unfair and simply wrong to make midstream policy changes that have such great financial impact on generators. At minimum this proposal should be written such that the revised policy does not apply until the 2017 generator downsizing window, which would give developers in queue one last opportunity to avoid this large forfeiture.

In reading the PG&E comments in the revised straw proposal on this topic, the concern of a downsizing generator reducing its financial “obligations” is unwarranted. The language in the current tariff for partial recovery of IFS already supports that a withdrawing generator is held responsible for any costs incurred up to the point of withdrawal. Beyond that, there is no other financial “obligation”. A withdrawing generator is not and should not be responsible to pay for sole use network upgrades for which the PTO incurred no costs.

If any proposal should be considered on this topic, it should allow for the downsizing generator to withdraw following validation of the downsizing request, rather than being required to wait until the study is complete with the caveat that IFS cannot be released until the completion of the study. This would allow for a more accurate downsizing study (the substation bay position evaluation, protection evaluation, etc would all be more accurate w/o the generator included), yet still protect the PTO from being able to capture any portion of the NU IFS for which costs were previously incurred.

**Topic 11 –TP Deliverability Option B Clarifications**