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**8MINUTENERGY COMMENTS ON GENERATION INTERCONNECTION PROCEDURES CLUSTER 1 AND 2
DELIVERABILITY CONCERNS DISCUSSION PAPERS**

8minutenergy ("8me") commends the efforts of the CAISO staff for preparing the supplementary discussion paper on Cluster 1 and 2 Deliverability Concerns which contains some good but generic and vague information.

The much waited Discussion Paper does not provide any specific and concrete information that could be used by LSEs' procurement department, developers in PPA negotiations. The feedback from LSEs we received on the usability of this Discussion Paper in PPA negotiations is negative due to the lack of specificity in study results which are of general nature. What the LSEs were looking for are statements on deliverability of generator projects.

Since 8me projects are located in SDG&E service area which is not explicitly identified in this discussion paper, some questions need further clarification from the ISO.

1. Were C1/C2 projects in SDG&E area modeled and dispatched to full output in this Deliverability Analysis?
2. Were any of the SDG&E projects dropped in this Deliverability analysis?
3. Does the 9900-12000 MW range identified in the report include SDG&E C1/C2 projects?
4. ISO has mentioned "threshold" generation few times in this report. What is that number?
5. On what basis did ISO choose 7000 MW of Renewable generation (page 5) in its 2011/2012 TPP?
6. Did the ISO 7000 MW include renewable generation in SDG&E area?

7. What will be the ISO recommendation to LSEs and CPUC for "Threshold" generation affecting Lugo-Victorville 500 kV line?

For those projects that are not part of generation dropping identified in the discussion paper and do not warrant three 500 kV upgrades for Category C events need revised Phase II study results report and draft LGIA reflecting revised cost estimates since developers and LSEs are conducting PPA negotiations at this time. It would be appreciated if CAISO could advance this requirement promptly with revised milestone and timelines so that developers and LSEs can proceed with PPA negotiations in a timely manner.

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