

Stakeholder Comments Template

Subject: Small and Large Generator Interconnection Procedures Draft Final Proposal and Meeting

Submitted by	Company	Date Submitted
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BAMx appreciates this opportunity to comment on the CAISO's GIP Draft Final Proposal.

It is unfortunate that the CAISO has relegated the issue of enhanced data availability to next year's stakeholder process. The CAISO's SGIP and LGIP processes have not been open and transparent and certainly not compliant with FERC Order 890 requirements. The CAISO's and PTO's "decisions and judgments" should be verifiable through stakeholders' access to sufficient information to form decisions and judgments of their own. There can be no justification stronger than the fact that stakeholders who ultimately pay for all system upgrade costs deserve to receive sufficient information to verify the need for such expenditures.

While confidentiality for security and competitive purposes is necessary and required of those of us that have executed confidentiality agreements, the CAISO and PTOs can do a far better job of masking or redacting commercial information in your studies to enable better disclosure of the results that support your "decisions and judgments".

In order to promote meaningful stakeholder participation through sufficient openness and transparency, as required by FERC mandates, the CAISO should permit parties that execute the required confidentiality agreements access to study results underlying the CAISO's and PTO's project decision-making and exercise of judgment. The current and proposed provision of base case data is not sufficient to provide the ability to analyze and evaluate CAISO and PTO decisions and judgments. All stakeholders, including those that ultimately shoulder the costs of projects, (not just the project proponents, CAISO and PTOs) have an important stake in the outcomes of CAISO and PTO decisions and judgments.

This problem with insufficient data availability pervades planning forums beyond the GIPR. The Revised Transmission Planning Process, including its high priority economic planning studies, and the Location Constrained Resource Interconnection Facility process both suffer the same lack of openness and transparency that not only denies stakeholders access to information, but threatens the viability of these processes and their intended outcomes when submitted to FERC for approval.

BAMx proposes that at absolute minimum, the CAISO devise a way for plans, data and studies that will likely or have resulted in a need for network upgrades to be masked, redacted or modified in such a way as to serve the needs of security, commercial and ratepayer interests, while providing access to entities that are subject to confidentiality agreements.

The CAISO's proposed Annual Cluster Study Timeline is devoid of meaningful stakeholder review opportunities. Several junctures in the timeline would be greatly enhanced with the inclusion of stakeholder opportunities for involvement. Specifically, at the outset of Phase 1 cluster studies, when initial generation groups are developed, the PTOs draft base cases, direct interconnection plans and contingency lists, the CAISO can assess preliminarily the need for network upgrades. This can be reported to stakeholders and feedback solicited. Next, when load flows, post transient and stability studies, deliverability studies and cost allocations are determined, stakeholders should

be given an opportunity to review and comment. The point at which the CAISO has reviewed the PTOs' final reports, including facility cost estimates and schedules and the CAISO is ready to propose a final study report would be another vital juncture for stakeholder review.

Phase 2 of the proposed Annual Cluster Study Timeline also should include stakeholder reviews, especially after large network upgrades have been identified, and especially prior to issuance of the Final Plan of Service Report.

It is difficult to imagine that the CAISO's proposed Generator Interconnection Process can be judged compliant with FERC Order 890 requirements for openness and transparency without adoption of the above suggestions or similar mechanisms to ensure openness and transparency and to promote meaningful stakeholder participation.