

## Stakeholder Comments Template

### Subject: Generator Interconnection Procedures Straw Proposal and Meeting

Submitted by	Company	Date Submitted
David Miller, PhD Low Carbon Grid Program Coordinator <a href="mailto:david@ceert.org">david@ceert.org</a> 916-340-2638	Center for Energy Efficiency and Renewable Technologies	June 18, 2010

This template was created to help stakeholders submit written comments on topics related to the May 26, 2010 Generator Interconnection Procedures Straw Proposal and June 3, 2010 Generator Interconnection Procedures Stakeholder Meeting. Please submit comments and thoughts (in MS Word) to [dkirrene@caiso.com](mailto:dkirrene@caiso.com) no later than the close of business on June 21, 2010.

Please add your comments where indicated responding to the questing raised. Your comments on any other aspect of the proposal are also welcome. The comments received will assist the ISO with the development of the Draft Final Proposal.

#### Proposed Independent Study Process

1. Do you think that the proposed independent study process criteria are appropriate?

CEERT would like to request more clarity on the independent study process criteria, especially on how the CAISO is defining electrical independence.

CEERT would also like more clarity on the conditions under which the CPUC is able to designate projects for independent study. While we recognize the potential benefit for expediting certain projects, we would like to see the conditions under which such a process could occur defined in a more explicit manner.

#### Proposed Study Deposit Amounts

Are the proposed study deposit amounts appropriate, if not please explain?

CEERT recommends a base fee and per MW fee instead of a flat fee for study deposits. The current proposed flat fee without a per MW fee provides incentive for developers to

propose the largest project size for the allowed lower fee, instead of an optimal size based on actual physical constraints.

### Deliverability Assessments

1. What are your thoughts on the proposed alternatives for deliverability assessments?

CEERT supports a process where generators of any size with existing EO projects or EO projects in the queue / cluster study are able to explicitly apply for FC. Under the current alternative 1, there is no explicit application process so RA may be awarded to EO projects with no use for this capability, thereby impeding the awarding of RA to those projects explicitly requesting it. While alternative 1 may be a useful way of allocating excess “deliverability” in the system on an annual basis, alternative 2 should be used to provide FC to those projects explicitly requesting it.