

Stakeholder Comments Template

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

| Submitted by | Company | Date Submitted |
|--|---|----------------|
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Fast Track less than 2 MW

1. Should the ISO remove the 10th screen from the Fast Track? Why or why not?

Yes, CEERT recommends that the 10th screen be removed from the Fast Track requirements as it makes compliance overly restrictive.

2. Should the ISO increase the size limit for Fast Track qualification? If so, would you support a 5MW size limit or a different value? Explain your reasons.

CEERT recommends increasing fast track maximum size to 20 MW as this would promote the timely development of wholesale distributed generation projects.

Do you have any additional comments that you would like to provide?

CEERT would like to request that a formal reporting system be implemented by the CAISO on a quarterly or biannual basis that would graphically represent the trend in project process time, by project size and by averaged project size. Such a compliance metric would highlight one of the key features of the process that is of interest to all stakeholders. While the raw data for this metric is already available publically, having the CAISO create this report would minimize the opacity inherent in having each stakeholder do the calculation themselves.