

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Interconnection Process Enhancements (IPE) Revised Straw Proposal for Topics 4, 5, and 13 posted on February 5 and as supplemented by the presentation and discussion during the February 13 stakeholder meeting.

Submit comments to GIP@caiso.com

Comments are due February 28, 2014 by 5:00pm

The Revised Straw Proposal for Topics 4, 5, and 13 posted on February 5 may be found at:

http://www.caiso.com/Documents/RevisedStrawProposal_Topics4-5-13_InterconnectionProcessEnhancements_020514.pdf

The presentation discussed during the February 13 stakeholder meeting may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancements-RevisedStrawProposal-Topics4-5-13.pdf

Please provide your comments on the ISO's proposal for each of the topics listed below.

Topic 4 – Improve Independent Study Process

Please comment on the ISO's proposed enhancements to improve the independent study process in each of the following four areas:

- Criteria for ISP eligibility.
- Process and timeline enhancements.

- Tests for electrical independence.
- Clarification on behind-the-meter (“BTM”) expansion and its impact on net qualifying capacity “NQC”).

CPUC Staff support BTM expansion not impacting previously assigned deliverability status of a resource’s pre-BTM expansion capacity. We believe that generation projects undergoing BTM expansion and independent study should be eligible to apply for additional deliverability available over the transmission network via the Annual Full Capacity Deliverability Option if this would be more efficient and timely than entering the next cluster study, provided that the project in question meets all reliability and other requirements applicable to customers seeking independent study, and to customers pursuing the Annual Full Capacity Deliverability Option.

Topic 5 – Improve Fast Track

Note: The ISO’s revised straw proposal consists of two parts: (1) revisions to the fast track screens, processing fees, and the supplemental review timeline; and (2) compliance with FERC Order 792.

Please comment on the ISO’s proposed revisions to improve the fast track process including revisions to the fast track screens, processing fees, and the supplemental review timeline.

Please comment on the ISO’s proposal to comply with FERC Order 792 in each of the following areas:

- Pre-application report process
- Fast track eligibility
- Customer options meeting and supplemental review process
- Opportunity to submit comments on any required upgrades in the facilities study
- Account for the interconnection of storage devices under small generator interconnection procedures

- Require ICs wishing to interconnect using network resource interconnection service to do so under the LGIP

CPUC Staff believe that the revised straw proposal regarding Topic 5 “Improve Fast Track” represents appropriate reforms that are generally consistent with (or superior to) FERC Order 792 requirements and appear to be compatible with Rule 21 reforms. However, we await feedback from other stakeholders as well as development of actual tariff language.

Topic 13 – Clarify timing of transmission cost reimbursement

Note: Based on stakeholder feedback, the ISO is offering two alternative straw proposals for stakeholder consideration and requests stakeholders to comment on the pros and cons and their preferences relative to each option.

Please comment on Option A.

Option A is too restrictive in requiring that reimbursement for interconnection customers’ security deposits must wait until all network upgrades are completed regardless of how long any upgrades are delayed or what portion of total upgrades have already been completed. We prefer the Option A variation described in the revised straw proposal, under which reimbursement would commence for those network upgrades placed in service, perhaps on an aggregate calendar year basis, not waiting for *all* upgrades to be in service. However, we prefer Option B.

Please comment on Option B.

CPUC Staff support reimbursement commencing upon commercial operation, for those deposits posted by an interconnection customer up to the time a customer’s facility or phase achieves commercial operation. However, reimbursement for deposits due on dates subsequent to the customer’s date of commercial operation should begin

when each distinct network upgrade (for which a share of the deposits can be distinguished) is placed in service. Furthermore, any refunding of security deposits being delayed pending network upgrade completion should commence no later than one year after the network upgrade completion date specified in an interconnection agreement (e.g., as a milestone).

Additionally, CPUC Staff recommend that new reimbursement provisions be applied to all interconnection customers in good standing, because waiting to apply new provisions to the *first interconnection cluster for which no GIAs have been tendered at some future date of FERC approval of these provisions* will leave numerous interconnection customers unable to benefit from the new provisions and perhaps experiencing long reimbursement delays.