

**Comments of the California Wind Energy Association
on the CAISO Proposed Revisions to the Queue Cluster 4 Phase 1 Study Methodology
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The California Wind Energy Association (CalWEA) appreciates the opportunity to submit these comments on the California Independent Transmission System Operator, Inc.'s (CAISO) proposed revisions in the methodology to perform Phase 1 Interconnection Studies for interconnection requests in Queue Cluster 4 (QC-4).

First, CalWEA wishes to support the CAISO's proposed "simplified" approach for Phase-1 cost estimation of generation interconnection requests (IRs) in QC-4 especially given the very difficult circumstances that the CAISO is facing in studying the massively large size of the QC-4 IRs. In fact, given the understanding that we all have gained with the relevance and accuracy of the Phase 1 study process, CalWEA would go one step further and encourage the CAISO to consider using this revised approach (or another similarly simplified methodology) for the Phase 1 studies of all future generation clusters.

Second, in implementing this revised Phase 1 study approach for QC-4, we would ask the CAISO to confirm what we believe was stated in the related phone conference on July 29, 2011: that all of the CPUC renewable generation portfolio scenarios will be considered and the largest generation value that results from any one of them for any of the specific study area will be "mapped" into that study area. The CAISO should not rely on just one of the CPUC renewable generation portfolio scenarios so as to avoid the impression that the CAISO is performing "central planning" at the expense of competition in resource development.

Third, we would like to request that the CAISO extend the Phase 1 Interconnection Financial Security (IFS) posting deadline for the QC-3 projects to coincide with that of the QC-4 projects. As the CAISO is well aware, projects in QC-3 are required to post their Phase 1 IFS deposits by the latter part of this month, even though their Phase 2 studies will not be conducted until early 2012, along with those of the QC-4 projects. At the same time, projects in QC-4 will have until the end of the 2011 (and potentially beyond) to post their Phase 1 IFS deposits. As such, we find it unfair for the CAISO to require QC-3 projects to post their IFS deposits four months ahead of the QC-4 projects for the same exact outcome. Hence, the CAISO should extend the IFS posting deadline for the QC-3 projects to coincide with that of the QC-4 projects. We understand that to comply with this one-time request, the CAISO will have to file for a FERC tariff waiver and, hence, ask the CAISO to immediately take action on the waiver.