

Decision on interconnection process enhancements for independent study and fast track processes and FERC Order 792

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Interconnection process enhancements initiative is a continuing effort to improve generation interconnection rules.

- Proposals for queue management and downsizing have already received Board approval through this initiative
- Two additional interconnection process enhancement topics are now ready for Board consideration
 - Improvements to the independent study process
 - Improvements to the fast track process
- Compliance filing for FERC Order Nos. 792 & 792-A were added to the scope of the fast track process improvement



Management proposes four areas of enhancements to the independent study process.

- 1. Criteria for independent study eligibility further defined
- 2. Tests for electrical independence relaxed
- 3. Process and timeline enhancements
- 4. Clarifications and modifications to behind-the-meter expansion



Management's proposed changes to behind-the-meter expansions include the following:

Proposed clarifications:

- Size of the expansion
- Impact on net qualifying capacity of the original project
- Non-eligibility for full capacity deliverability status

Proposed modifications:

- Removed requirement for a separate expansion breaker
 - Separate resource ID and separate metering required to maintain full capacity deliverability status
 - Limited exception for same technology
- Automatic tripping scheme required
- Allow separate ownership of expansion from the original facility



Management proposes several improvements to the fast track interconnection process.

- Revisions made to align process with transmission interconnection requirements; original requirements designed for distribution system
 - Eligibility screens revised
 - Studies revised
 - Supplemental review process enhanced
 - Timelines revised to reflect revised study functions
- Small processing fee eliminated
- Study deposit increased from \$1,000 to \$25,000 to reflect cost of performing a facility study
- Process reviewed against FERC Orders 792; 792-A and revised as necessary



Management proposes to address FERC Order 792 compliance through fast track and other tariff revisions.

- Variations allowed under "independent entity" standard
 - regional variations
 - variations that are consistent with or superior to the final rule
- Requirements met by current ISO tariff provisions:
 - Fast track eligibility thresholds
 - Customer comments on study results
 - Clarify certain sections of pro forma SGIA
- Requirements addressed by new tariff provisions:
 - Pre-application report process
 - Criteria for the interconnection of storage devices 20 MW or less
- Requirements addressed through fast track improvements:
 - Customer options meeting and supplemental review process



Management recommends approval of the proposal.

- Broadly supported by stakeholders
- Refined to address most of the stakeholders' comments and concerns
- Significantly improves the quality and effectiveness of the independent study and fast track processes
- Complies with FERC Orders 792 & 792A

