

## Stakeholder Comments Template

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

Submitted by	Company	Date Submitted
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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?
  - **Considering the amount of queued projects, it seems independent study process proposed seems like it will apply to few, if any, projects. Since we don't have sufficient information to know this, though, all projects should have a quick high-level review to determine if they qualify. We could suggest a process similar to the Midwest ISO in which a very quick screening is made of the projects that join a particular cluster. A project could qualify the independent study process on purely technical merits. MISO currently used a truth table to determine if a project is truly independent or not.**
2. How should the proposed independent study process be specifically modified to incorporate desired features that are in the current SGIP serial process?
3. How can the independent study criteria be modified to allow PTOs to utilize this process if they do not have a backlog and waiting for the cluster window does not make sense?

4. What pre-application information and guidance is needed to prequalify projects so that the process is not overwhelmed with applications?
5. How much “ISO and PTO judgment” should be allowed in qualifying projects and how should it be delineated?
  - **Parameters should be established upfront in the Tariff as part of the new process.**
6. What would be sufficient transparency into the ISO and PTO judgment process in qualifying projects and how would that be provided?
  - **See response for #5**
7. If the proposed independent study process is included in the final proposal, is there still a need for the current LGIP Phase II accelerated study process? (CAISO Tariff Appendix Y Section 7.6)
  - **It depends on the form that the Independent Study Process ultimately takes. Its too early to say.**

#### Proposed Study Deposit Amounts

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

- **Deposit amount are often much higher than actual study costs. Deposits need to be right-sized**

#### Proposed Cluster Study Process

Do the proposed timelines for the cluster study process seem reasonable? Please add explanations for both yes or no responses?

- **One queue window a year is simply not sufficient to serve the ambitious procurement and RPS goals of the LSEs. The market is too dynamic to force such limitations. There should be at least 2-3 windows per year at a mimum, if not more.**

#### Coordinating generator interconnections with the transmission planning process

Do you support the concept of coordinating the proposed generator interconnection process with the transmission planning process, why or why not?

- **While a good idea – it will further day interconnection process**

Deliverability Assessments

1. What are your thoughts on the proposed alternatives for deliverability assessments?
  - **Deliverability is a significant issue. The solution lies somewhere in between CAISO's Option 1 and Option 2, but it is pointless to assign deliverability status to projects that have not or will not be requesting it (part of Option 1). CAISO should handle these requests as expeditiously as possible so that projects lose as little time as possible. Deliverability rights for a short period (1 year) does not provide sufficient reassurance for economic project viability.**
2. What adjustments should be made to each alternative?
  - **CAISO deliverability should be available to generators not interconnecting directly to the ISO Controlled Grid but within the CAISO balancing authority regardless of which Deliverability Alternative process selected. Even if it's not part of the "Interconnection Process"**

Proposed Transition Plan

1. Do you think that the proposed transition plan is reasonable for LGIP projects?
2. Do you think that the proposed transition plan is reasonable for SGIP projects?
3. Do you have any comments on the proposed dates for grandfathering projects in queue and migration of new projects and in queue projects into the proposed cluster process?

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