

June 12, 2015

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: California Independent System Operator Corporation  
Docket No. ER14-2586-\_\_\_\_  
Compliance Filing**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) submits this filing to comply with the Commission's order issued on May 29, 2015 in the above-referenced proceeding.<sup>1</sup> In that order, the Commission accepted tariff revisions proposed by the CAISO to improve the efficiency and flexibility of its interconnection processes as well as to comply with the Commission's Order No. 792, subject to a further compliance filing.<sup>2</sup>

## **I. Background**

The CAISO filed tariff revisions in this proceeding to enhance two of its interconnection processes: (1) the independent study process, which allows generators that can demonstrate that they are independent of other projects in the queue to be studied serially outside the cluster studies; and (2) the fast track interconnection process, which allows qualifying small generators to interconnect through a significantly streamlined set of procedures. As part of this filing, the CAISO also proposed tariff revisions to satisfy the requirements of the Commission's Order No. 792. These tariff revisions, including revisions to the CAISO's fast track interconnection process, principally involved changes to the

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<sup>1</sup> *California Independent System Operator Corp.*, 151 FERC ¶ 61,188 (2015) ("May 29 Order"). The CAISO submits this filing pursuant to section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO tariff, and references to specific sections, articles, and appendices are references to sections, articles, and appendices in the current CAISO tariff as revised or proposed in this filing, unless otherwise indicated.

<sup>2</sup> *Small Generator Interconnection Agreements and Procedures*, Order No. 792, 145 FERC ¶ 61,159 (2013) ("Order No. 792"), *order clarifying compliance procedures*, Order No. 792-A, 146 FERC ¶ 61,214 (2014) ("Order No. 792-A").

## CAISO's Generator Interconnection and Deliverability Allocation Procedures (GIDAP).

In November 2014, the Commission issued an order largely accepting the proposed changes to the CAISO's independent study process, conditionally accepting some of the CAISO's proposed changes to comply with Order No. 792, and largely rejecting other changes related to the proposed fast track interconnection process, including the CAISO's proposed fast track review, customer options meeting, and supplemental review.<sup>3</sup> The CAISO submitted a compliance filing on December 3, 2014 to revise its GIDAP in response to the Commission's order, including restructuring its fast track interconnection process to include a set of initial screens and a supplemental review process. In its *May 29 Order*, the Commission accepted these changes subject an additional compliance directive.<sup>4</sup>

### **II. Compliance directive and proposed tariff revision**

In its May 29 Order, the Commission required the CAISO to submit another compliance filing within 30 days to revise the CAISO tariff to state that the CAISO will include an interconnection customer's written comments in an interconnection facilities study report. The CAISO proposes to comply with the directive in the Commission's May 29 Order through tariff revisions to the GIDAP (Appendix DD of the CAISO tariff) because the CAISO will process all new requests pursuant to the GIDAP. The CAISO proposes to incorporate language into the GIDAP that states the CAISO shall include any written comments it receives from an interconnection customer in the final system impact and facilities study report for those interconnection customers using the independent study process.<sup>5</sup>

### **III. Communications**

Correspondence and other communications regarding this filing should be directed to:

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<sup>3</sup> *California Independent System Operator Corp.*, 149 FERC ¶ 61,100 (2014).

<sup>4</sup> May 29 Order at PP 14-15.

<sup>5</sup> See Attachment B hereto – redline changes to Section 4.4.4 of Appendix DD of the CAISO tariff.

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#### **IV. Service**

The CAISO has served copies of this filing on the California Public Utilities Commission, the California Energy Commission, and all parties with scheduling coordinator agreements under the CAISO tariff. In addition, the CAISO has posted a copy of the filing on the CAISO website.

#### **V. Contents of Filing**

In addition to this transmittal letter, this filing includes the following attachments:

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|--------------|---|
| Attachment A | Clean CAISO tariff sheets incorporating this tariff amendment               |
| Attachment B | Red-lined document showing the revisions contained in this tariff amendment |

**VI. Conclusion**

The CAISO respectfully requests that the Commission accept the tariff revisions submitted with this filing as being in full compliance with the Commission's May 29 Order.

Respectfully submitted,

**By: /s/ Andrew Ulmer**

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## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom this 12th day of June, 2015.

/s/ Martha Sedgley  
Martha Sedgley

**Attachment A– Clean Tariff Records**

**IPE 4-5 Second Compliance Filing**

**California Independent System Operator Corporation**

## Appendix DD

### Generator Interconnection and Deliverability Allocation Procedures (GIDAP)

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#### Section 4 Independent Study Process

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#### Section 4.4 System Impact Study

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**4.4.4.** If requested by the Interconnection Customer, a Results Meeting shall be held among the CAISO, the applicable Participating TO(s), and the Interconnection Customer to discuss the results of the system impact and facilities study report, including assigned cost responsibility. The CAISO shall prepare minutes from the meeting. Any such Results Meeting will be held within twenty (20) Business Days of the date the system impact and facilities study report is provided to the Interconnection Customer.

Should the Interconnection Customer provide written comments on the system impact and facilities study report within ten (10) Business Days of receipt of the report, but in no event fewer than three (3) Business Days before the Results Meeting conducted to discuss the report, whichever is sooner, the CAISO will address the written comments in the Results Meeting. Should the Interconnection Customer provide comments at any later time (up to the time of the Results Meeting), then such comments shall be considered informal inquiries to which the CAISO will provide informal, informational responses at the Results Meeting, to the extent possible. The Interconnection Customer may submit, in writing, additional comments on the final system impact and facilities study report up to three (3) Business Days following the Results Meeting. The CAISO shall include any written comments received from the Interconnection Customer in the final system impact and facilities study report.

Based on any discussion at the Results Meeting and any comments received, the CAISO (in consultation with the applicable Participating TO(s)) will determine whether it is necessary to follow the final system impact and facilities study report with a revised study report or an addendum. The CAISO will issue any such revised report or addendum to the Interconnection Customer no later than fifteen (15) Business Days following the Results Meeting.

Upon request, the CAISO shall provide the Interconnection Customer all supporting documentation, workpapers, and relevant pre-Interconnection Request and post-Interconnection Request power flow, short circuit, and stability databases for the final system impact or facilities study, subject to confidentiality arrangements consistent with Section 15.1.

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**Attachment B– Marked Tariff Records**

**IPE 4-5 Second Compliance Filing**

**California Independent System Operator Corporation**

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