

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company Stakeholder Comments

PG&E appreciates the opportunity to comment on the CAISO’s draft tariff language, published August 21, 2015, and commends the CAISO staff for their enthusiasm in moving forward these interconnection process enhancements. PG&E fully supports the draft tariff language for topics one through nine and topic eleven. PG&E is concerned about a possible inconsistency in the draft tariff language proposed for topic 10, as more fully described below.

CAISO Should Align the Draft Tariff Language in Appendix DD, Sections 7.5.6 and 11.4.2.2.b to Avoid Ambiguity Regarding the Megawatt Capacity Used to Determine the Interconnection Financial Security Amount

PG&E believes clarification is needed as to what megawatt capacity would be used to calculate the interconnection financial security (IFS) amount, i.e. what megawatt capacity would be used as a reference for the IFS amount should a generating facility be in the process of downsizing or later seek to downsize its capacity. PG&E recommends using consistent language to describe the pre-downsizing megawatt capacity of a generating facility to provide a clear, unambiguous reference for the CAISO, participating transmission owners, and interconnection customers.

In the revised straw proposal, the CAISO stated the goal of the enhancement: “[T]o reflect that any partial recovery of the [IFS] will be based on the pre-downsized capacity even if the project has completed the downsizing study.” As stated in PG&E’s comments on the revised straw proposal and draft final proposal, PG&E strongly supports the clarification of this enhancement “that ‘downsizing should be used to downsize [a] project and not merely to reduce forfeitures at withdrawal.’”

In the August 21 draft tariff language document, CAISO put forward the same draft language for Appendix DD, section 11.4.2.2.b that was in the revised straw proposal and the revisions to Appendix DD, section 7.5.6 that was in the straw proposal. However, PG&E notes that the CAISO uses language in section 7.5.6 that is not entirely aligned with section 11.4.2.2.b.

PG&E suggests modifying both tariff sections to bring them into alignment prior to Board approval.

Appendix DD, section 7.5.6

The current proposed tariff language reads as follows:

Any partial recovery of the Interconnection Financial Security for Network Upgrades under Sections 11.4.2.1 and 11.4.2.2 will therefore be calculated based on the Interconnection Customer’s most recent MW capacity prior to its downsizing request.

PG&E suggests the following change to this section:

Any partial recovery of the Interconnection Financial Security for Network Upgrades under Sections 11.4.2.1 and 11.4.2.2 will therefore be calculated based on the Interconnection Customer's last studied MW capacity as published by the CAISO as part of the Interconnection Study Cycle prior to the last downsizing request.

Appendix DD, section 11.4.2.2.b

The current proposed tariff language reads as follows:

the Interconnection Financial Security plus (any other provided security plus any separately provided capital) minus the lesser of fifty (50) percent of the value of the posted Interconnection Financial Security for Network Upgrades or \$20,000 per requested and approved, pre-downsized megawatt of the Generating Facility Capacity.

PG&E suggests the following change to this section:

the Interconnection Financial Security (plus any other provided security plus any separately provided capital) minus the lesser of fifty (50) percent of the value of the posted Interconnection Financial Security for Network Upgrades or \$20,000 per requested and approved, megawatt of the Generating Facility Capacity as defined in the Interconnection Customer's last studied MW capacity as published by the CAISO as part of the Interconnection Study Cycle prior to the last downsizing request.