

Generator Interconnection Procedures Draft Tariff Language

Submitted by	Company	Date Submitted
<i>Jason Yan, , JAY2@pge.com, 415-973-4004</i>	<i>Pacific Gas and Electric Company (PG&E)</i>	<i>October 6, 2010</i>
<i>Joscelyn Wong, , JMTj@pge.com, 415-973-4648</i>		

PG&E appreciates the opportunity to provide comments on the CAISO's draft tariff language to implement the revised and combined generator interconnection procedures for small and large generators (GIP).

Comments

1. The tariff language does not include the definition of Site Exclusivity.
2. PG&E has concerns with the implications with respect to timing and ability to meet customer expectations of the proposed changes to the Fast Track process which would eliminate the tenth screen.

Section 2.2.10 of the SGIP, the tenth screen in the Fast Track process, states "No construction of facilities by the PTO on its own system shall be required." As PG&E noted in previous comments, this screen should not be eliminated. The need for new transmission facilities could make it difficult to accelerate the overall schedule even in the simplest of interconnections.

3. Section 3.5.2.2 Deficiencies in Interconnection Request: There is no specified timeline for the Interconnection Customer to correct any deficiencies under the Serial, Fast Track or Independent Study processes. PG&E recommends that the same timelines noted in Section 3.5.2.2 be applied to the Serial, Fast Track, and Independent Study processes. The language in Section 3.5.2.2 allows for 10 business days after the CAISO first provides notice that the Interconnection Request is not valid or within 20 business days after the close of the applicable window, whichever is later.
4. PG&E is concerned about the proposed dates for grandfathering SGIP projects in the queue. The Serial Group under the Draft Final Proposal included those SGIP projects who's Interconnection Requests were received prior to October 1, 2010 and

have a signed study agreement no later than July 30, 2010. SGIP projects that qualified for the Serial Group under the Draft Final Proposal would remain as Energy Only. SGIP projects that desired Full Capacity would be studied as part of the Cluster 4 study process.

PG&E is concerned about the December 15, 2010 cut-off date for the Serial Group under Section 1.2.2 of the GIP Appendix 8. This date would leave a considerable amount of SGIP projects in the serial process. The Serial Group would have consisted of 26 SGIP projects in PG&E service territory under the Draft Final Project. With the proposed tariff language, the Serial Group would increase to approximately 70 SGIP projects based on the projects currently in the CAISO queue. PG&E recommends that the CAISO consider making the cut-off date the same as the FERC filing date.

The CAISO and ICs should be aware that, as based on past experience with the LGIP Serial projects, PG&E cannot guarantee that the SGIP Serial projects will be completed any sooner than the SGIP Transition Group.

5. Section 4.2.1 Flow impact test: In subsection (ii) there is a typographical error. The parenthetical numerical expression of "five percent" should either read "(0.05)" or "(5%)".
6. Under the Fast Track process, the PTOs are expected to tender an Interconnection Agreement to the Interconnection Customer within 5 business days of either passing of the screens or a CAISO/PTO determination under Sections 5.3.2 and 5.3.3. This timeline is highly optimistic and is not realistic. PG&E recommends 30 Calendar Days to be consistent with the IA timelines for the Facilities and Cluster Studies.
7. PG&E believes that 15 business days for Initial Review and 10 business days for Supplemental Review is not sufficient under Section 5.2 and 5.5.1 of the Fast Track process. With the proposed change to increase the cap of the Fast Track to 5MW, PG&E believes that more rigor is necessary to perform the Initial Review and Supplemental Review and thus more time should be allotted. PG&E recommends 30 Business Days for the Initial Review and 30 Business Days for the Supplemental Review. With the elimination of the tenth screen and the increase to 5 MW for the Fast Track process, the number of projects that qualify for Fast Track will greatly increase and impact the PTOs' ability to complete the reviews in a timely manner.
8. Section 6.2 Scoping Meeting: PG&E requests the option to move directly to drafting the Interconnection Agreement. There may be interconnection requests that have no material modification and thus no need to conduct the Study Process nor the Fast Track Process for example renegotiations of Interconnection Agreements and QF conversions.

In addition, there is a typographical error in the fourth paragraph. The sentence should read "...provide the Interconnection Customer and the other attendees an opportunity to..."

9. Section 4.5.4: PG&E suggests that Interconnection Customers must make their request for a Results Meeting within 10 Business Days of the receipt of the facilities study report. Any such Results Meeting will be held within 20 Business Days of the date of the facilities study report is provided to the Interconnection Customer.