

## Summary of main comments

- The difference between the problems that would cause an IR to fail the “completeness test and those that would cause a completed IR to fail the validation test is not clearly explained.
- There appears to be an inconsistency between the timeline for curing submittal errors in the earlier CAISO presentation and the tariff language here.

## Appendix DD

### Section 3 Interconnection Requests

#### 3.1 General

Pursuant to CAISO Tariff Section 25.1, an duly authorized officer or agent of the Interconnection Customer shall will submit to the CAISO (A) an Interconnection Request in the form of consistent with Appendix 1 to this GIDAP, including: (2) an executed Generator Interconnection Study Process Agreement consistent with Appendix 3 to this GIDAP; and (2) Appendix B to the Generator Interconnection Study Process Agreement, pursuant to Section 7 of this GIDAP.<sup>1</sup>

All forms may be submitted electronically as provided on the CAISO website. Interconnection customers will submit Appendix B to the Generator Interconnection Study Process Agreement pursuant to Section 7 of this GIDAP. The CAISO will forward a copy of the Interconnection Request to the applicable Participating TO within five (5) Business Days of receipt.

The Interconnection Customer shall submit a separate Interconnection Request for each site and may submit multiple Interconnection Requests for a single site. The Interconnection Customer must submit a n Interconnection Study el eposit with each Interconnection Request even when more than one request is submitted for a single site. An Interconnection Request to evaluate one site at two different voltage levels shall be treated as two Interconnection Requests.

An Interconnection Request for Customer with a proposed Small Generating Facility shall be evaluated using the maximum rated capacity that the Small Generating Facility is capable of injecting into the CAISO’s electric system. However, if the maximum capacity that the Small Generating Facility is capable of injecting into the CAISO’s electric system is limited (e.g., through use of a control system, power relay(s), or other similar device settings or adjustments), then the Interconnection Customer must obtain the CAISO’s agreement, with such agreement not to be unreasonably withheld, that the manner in which the Interconnection Customer proposes to implement such a limit will not adversely affect the safety and reliability of the CAISO’s system. If the CAISO does not so agree, then the Interconnection Request must be withdrawn or revised to specify the maximum capacity that the Small Generating Facility is capable of injecting into the CAISO’s electric system without such limitations. Furthermore, nothing in this section shall prevent the CAISO from considering an output higher than the limited output, if appropriate, when evaluating system protection impacts.

#### 3.2 Roles and Responsibilities

- (a) Each Interconnection Request will be subject to the direction and oversight of the CAISO. The CAISO will conduct or cause to be performed the required Interconnection Studies

<sup>1</sup> Please note that the revisions in 3.1, 3.5.1, and 6.1 in the second color have already been filed with FERC pursuant to other IPE topics. What does “second color” mean? The CAISO edits here appear to be in only one color.

Commented [S1]: Moved from below.

and any additional studies the CAISO determines to be reasonably necessary, and will direct the applicable Participating TO to perform portions of studies where the Participating TO has specific and non-transferable expertise or data and can conduct the studies more efficiently and cost effectively than the CAISO. The CAISO will coordinate with Affected System Operators in accordance with Section 3.7.

- (b) The CAISO will complete or cause to be completed all studies as required within the timelines provided in this. Any portion of the studies performed at the direction of the CAISO by the Participating TOs or by a third party shall also be completed within timelines provided in this GIDAP.
- (c) The CAISO has established a pro forma Roles and Responsibilities Agreement, attached hereto as Appendix 4 and incorporated herein by reference, for execution by the CAISO and the applicable Participating TOs.
- (d) Each Interconnection Customer shall pay the actual costs of all Interconnection Studies, and any additional studies the CAISO determines to be reasonably necessary in response to the Interconnection Request. The CAISO shall reimburse the Participating TO for the actual cost of any portion of all Interconnection Studies that such Participating TO performs at the direction of the CAISO.

### 3.3 Timing for Submitting Interconnection Requests

#### 3.3.1 Timing for Submitting Interconnection Requests for a Queue Cluster

Except for Interconnection Customers requesting processing under the Independent Study Process or Fast Track Process, Interconnection Requests must be submitted during a Cluster Application Window. The Cluster Application Window will open on April 1 and close on April 15 of each year. If any date set forth in this section is not a Business Day, then the applicable date shall be the next Business Day.

#### 3.3.2 Timing for Submitting Interconnection Requests for Independent Study Process and Fast Track Process

Interconnection Customers may submit Interconnection Requests for processing under the Independent Study Process or the Fast Track Process at any time during the year.

### 3.4 [Not Used]

### 3.5 Processing of Interconnection Requests

#### 3.5.1 Initiating **and completing** an Interconnection Request.

To initiate an Interconnection Request, except as set forth for the Fast Track Process in Section 5, and have the Interconnection Request considered for validation under Section 3.5.2, the Interconnection Customer must submit all of the following during the Cluster Application Window, or at any time during the year for proposed Generating Facilities applying for processing under the Independent Study Process:

- (i) An Interconnection Study Deposit of \$150,000. The CAISO requires Interconnection Study Deposits to review and validate the Interconnection Request. Notwithstanding Section 3.5.2 of this GIDAP or any other provision regarding validation or the ability to cure deficiencies, the CAISO will not review, process, or validate an Interconnection Request absent the Interconnection Study Deposit. Any Interconnection Request for which the Interconnection Customer has not submitted a complete Interconnection Study Deposit by April

15 (or the next Business Day if April 15 is not a Business Day) will be deemed invalid, and the Interconnection Customer will have no opportunity to cure or otherwise have the Interconnection Request included in that year's Queue Cluster.

**Commented [SRS2]:** Moved here from below.

(ii) A completed application in the form of Appendix 1, including requested Deliverability status, requested study process (either Queue Cluster or Independent Study Process), preferred Point of Interconnection and voltage level, and all other required technical data, including all data requested in Attachment A to Appendix 1 in Excel format without error.

**Commented [S3]:** See below – confusion about "errors" here and "deficiencies" under the validation process.

(iii) Demonstration of Site Exclusivity or, for Interconnection Requests in a Queue Cluster, a posting of a Site Exclusivity Deposit of \$100,000 for a Small Generating Facility or \$250,000 for a Large Generating Facility. The demonstration of Site Exclusivity, at a minimum, must be through the Commercial Operation Date of the new Generating Facility or increase in capacity of the existing Generating Facility.

(iv) A load flow model.

(v) A dynamic data file.

(vi) A reactive power curve.

(vii) A site drawing.

(viii) A single-line diagram.

(ix) A flat run plot and a bump test plot -from the positive sequence transient stability simulation application.

(x) A plot showing the requested MW at the Point of Interconnection from the positive sequence load flow application.

The CAISO requires the foregoing information to be complete and specific to the Interconnection Request. Consistent with Section 3.5.3, the CAISO will review each Interconnection Request and notify the Interconnection Customer whether it is complete within five (5) Business Days of submission

The CAISO requires Interconnection Study Deposits to review and validate the Interconnection Request. Notwithstanding Section 3.5.2 of this GIDAP or any other provision regarding validation or the ability to cure deficiencies, the CAISO will not review, process, or validate an Interconnection Request absent the Interconnection Study Deposit. Any Interconnection Request for which the Interconnection Customer that has not submitted a complete Interconnection Study Deposit by April 15 (or the next Business Day if April 15 is not a Business Day) will be deemed invalid, and the Interconnection Customer will have with no opportunity to cure or otherwise have the Interconnection Request be included in that year's Queue Cluster.

**Commented [SRS4]:** Moved above with Study Deposit requirement

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### 3.5.2 Validation of Interconnection Request.

The CAISO and Participating TO must validate that the Interconnection Request ~~deemed complete, as described above, does not contain deficiencies that would prevent its inclusion in the Phase I Interconnection Studies. Deficiencies include but are not limited to modeling errors, inaccurate data, and unusable files.~~

#### 3.5.2.1 Acknowledgment of Interconnection Request Validation Process.

The CAISO and Participating TO will notify the Interconnection Customer whether its Interconnection Request is valid or contains deficiencies within ten (10) Business Days of April 15 or when the Interconnection Request is deemed complete, whichever is later. All Interconnection Requests must be deemed valid by June 30 to be included in that year's Queue Cluster, shall notify the Interconnection Customer within ten (10) Business Days of receipt of the Interconnection Request, which notice shall state whether the Interconnection Request is deemed complete, valid, and ready to be studied.

**Commented [S5]:** This is an attempt to distinguish the "completeness" requirements above (which require data "without error" (paragraph (ii)) from these requirements, i.e., the difference between "errors" and "deficiencies." This was the subject of some confusion in the stakeholder process, and anything the CAISO can do here to clarify the difference would be helpful.

**Commented [SRS6]:** The criteria above for completeness of the IR says that there can be no "errors." So, how could an application with "errors" be deemed complete and ever make it to the validation stage?

#### 3.5.2.2 Deficiencies in Interconnection Request.

A ~~complete~~ Interconnection Request will not be considered to be a valid request until the CAISO determines that the information contained in the Interconnection Request ~~is complete and the Interconnection Customer has provided all items in satisfaction of Section 3.5.1 does not contain deficiencies that would prevent its inclusion in the Phase I Interconnection Studies. Deficiencies include but are not limited to modeling errors, inaccurate data, and unusable files.~~

If an Interconnection Request ~~fails to meet the requirements set forth in Section 3.5.1 has deficiencies~~, the CAISO shall ~~include state~~ in its notification to the Interconnection Customer ~~under Section 3.5.2.1 the reasons for such failure and that the Interconnection Request does not constitute a valid request and explain such deficiencies.~~

The Interconnection Customer shall provide the CAISO the additional requested information needed to ~~for the Interconnection Request to be constitute a valid request. Consistent with Section 3.5.3, W~~ whenever additional requested information is provided by the Interconnection Customer, the CAISO shall notify the Interconnection Customer within five (5) Business Days of receipt ~~of the additional requested information afterward~~ whether the Interconnection Request is valid.

If the ~~specified~~ Interconnection Request ~~deficiencies are not remedied continues to fail to meet the requirements set forth in Section 3.5.1 provide deficient information~~, the CAISO shall include in its notification to the Interconnection Customer the ~~reasons for such failure remaining deficiencies~~. If an Interconnection Request ~~has is not been~~ deemed valid, the Interconnection Customer must ~~submit all information necessary to meet the requirements of~~

**Commented [S7]:** How different from "errors" above? Also duplicates language from 3.5.2 above.

Section 3.5.1 cure all deficiencies no later than May 31/June 30 or the next Business Day if May 31/June 30 is not a Business Day. Interconnection Requests that have not met the requirements of Section 3.5.1 with deficiencies by after that date will be deemed invalid and will not be included in an Interconnection Study Cycle or otherwise studied.

Interconnection Requests deemed invalid under this Section 3.5.2.2 are not subject to Section 3.8. Interconnection Customers with invalid Interconnection Request under this Section 3.5.2.2 may seek relief under Section 15.5 by so notifying the CAISO within two (2) Business Days of the notice of invalidity.

### 3.5.3 Day-for-day Extensions.

The CAISO and Participating TO will use Reasonable Efforts to meet all timeliness deadlines in this Section 3.5 of the GIDAP. To the extent the CAISO and Participating TO cannot meet any timeliness deadline, the Interconnection Customer will receive a day-for-day extension on all remaining timeliness deadlines requiring its response until May 31.

Pursuant to Section 3.5.1, Interconnection Customers that submit their Interconnection Requests more than five (5) Business Days before April 15 will receive a notification from the CAISO regarding completion of their Interconnection Requests completion, and will have an opportunity to provide any missing information by April 15. To the extent the CAISO and Participating TO cannot meet the five (5) Business Day response time for Interconnection Requests submitted or corrected more than five (5) Business Days before April 15, the Interconnection Customer will receive a day-for-day extension on the April 15 completion deadline and the May 31 validation deadline. Interconnection Customers that submit or correct their Interconnection Requests within five (5) Business Days of April 15 may not receive a notification by April 15, will not receive any extension, and must have submitted a complete Interconnection Request to be validated pursuant to Section 3.5.2.]

Pursuant to Section 3.5.2, the CAISO and Participating TO will notify the Interconnection Customer whether its Interconnection Request is valid or contains deficiencies within ten (10) Business Days of April 15 or when the Interconnection Request is deemed complete, whichever is later. The CAISO will notify an Interconnection Customer within five (5) Business Days whether its Interconnection Request is now valid when an Interconnection Customer attempts to cure a deficiency. For all information submitted prior to May 31, to the extent the CAISO and Participating TO cannot meet the deadlines described here, the Interconnection Customer will receive a day-for-day extension on the June 30 deadline for validation. If an Interconnection Customer does not respond to a deficiency notice until after May 31, it will not receive any extension beyond the June 30 deadline for validation.

Commented [S8]: Not sure that this is how the proposal was written. (see NOTE below)

## **Section 6 Initial Activities and Phase I of the Interconnection Study Process for Queue Clusters**

The provisions of this Section 6 shall apply to all Interconnection Requests except those processed under the Independent Study Process selecting Energy Only Deliverability Status, the Fast Track Process, or the 10 kW inverter process as set forth in Appendix 7.

### **6.1 Initial Activities Following the Close of the Cluster Application Window**

#### **6.1.1 [Not used] Generator Interconnection Study Process Agreement**

**NOTE:** The slide below was included in the presentation for the January 3<sup>rd</sup> call on Addendum #2. It

implies that the 5 BD window for CAISO notification of IR completeness goes all the way to April 15<sup>th</sup>, i.e., applies to all IR submittals until the 15<sup>th</sup>.



By May 31 or the next Business Day if May 31 is not a Business Day, the CAISO shall provide to each Interconnection Customer with a validated Interconnection Request received during the Cluster Application Window a pro forma Generator Interconnection Study Process Agreement in the form set forth in Appendix 3. The pro forma Generator Interconnection Study Process Agreement shall specify that the Interconnection Customer is responsible for the actual cost of the Interconnection Studies, including reasonable administrative costs, and all requirements of this GIDAP. Within three (3) Business Days following the Scoping Meeting, the Interconnection Customer shall specify for inclusion in the attachment to the Generator Interconnection Study Process Agreement the Point of Interconnection for the Phase I Interconnection Study. Within ten (10) Business Days following the CAISO's receipt of such designation, the CAISO, in coordination with the applicable Participating TOs, shall provide to the Interconnection Customer a signed Generator Interconnection Study Process Agreement. The Interconnection Customer shall execute and deliver to the CAISO the Generator Interconnection Study Process Agreement no later than thirty (30) calendar days after the Scoping Meeting.

### 6.1.2 Scoping Meeting

Within five (5) Business Days after the CAISO notifies the Interconnection Customer of an Interconnection Request that is complete, valid, and ready for study, the CAISO shall establish a date agreeable to the Interconnection Customer and the applicable Participating TO(s) for the Scoping Meeting. All Scoping Meetings shall occur no later than June 30, unless otherwise mutually agreed upon by the Parties. The CAISO shall evaluate whether the Interconnection Request is at or near the boundary of an affected Participating TO(s) service territory or of any other Affected System(s) so as to potentially affect such third parties, and, in such case, the CAISO shall invite the affected Participating TO(s), and/or Affected System Operator(s) in accordance with Section 3.7, to the Scoping Meeting by informing such third parties of the time and place of the scheduled Scoping Meeting as soon as practicable.

The purpose of the Scoping Meeting shall be to discuss reasonable Commercial Operation Dates and alternative interconnection options, to exchange information including any transmission data that would reasonably be expected to impact such interconnection options, to analyze such information and to determine the potential feasible Points of Interconnection and eliminate alternatives given resources and available information. The applicable Participating TO(s) and the CAISO will bring to the meeting, as reasonably necessary to accomplish its purpose, the following: (a) such already available technical data, including, but not limited to, (i) general facility loadings, (ii) general instability issues, (iii) general short circuit issues, (iv) general voltage issues, and (v) general reliability issues, and (b) general information regarding the number, location, and capacity of other Interconnection Requests in the Interconnection Study Cycle that may potentially form a Group Study with the Interconnection Customer's Interconnection Request.

The Interconnection Customer will bring to the Scoping Meeting, in addition to the technical data in Attachment A to Appendix 1, any system studies previously performed. The applicable Participating TO(s), the CAISO and the Interconnection Customer will also

bring to the meeting personnel and other resources as may be reasonably required to accomplish the purpose of the meeting in the time allocated for the meeting. On the basis of the meeting, the Interconnection Customer shall designate its Point of Interconnection. The duration of the meeting shall be sufficient to accomplish its purpose.

The CAISO shall prepare minutes from the meeting, and provide the Interconnection Customer and the other attendees an opportunity to confirm the accuracy thereof, that will include, at a minimum, discussions among the applicable Participating TO(s) and the CAISO of the expected results and a good faith estimate of the costs for the Phase I Interconnection Study.