

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the 2015 Interconnection Process Enhancements (IPE) Draft Final Proposal that was posted on July 6, 2015 and as supplemented by the presentation and discussion during the July 13, 2015 stakeholder meeting.

Submit comments to InitiativeComments@caiso.com

Comments are due July 27, 2015 by 5:00pm

The Draft Final Proposal posted on July 6, 2015 may be found at:

http://www.caiso.com/Documents/DraftFinalProposal_InterconnectionProcessEnhancements-2015.pdf

The presentation discussed during the July 13, 2015 stakeholder meeting may be found at:

<http://www.caiso.com/Documents/Agenda-Presentation-InterconnectionProcessEnhancements2015-DraftFinalProposal.pdf>

For each topic that was modified in the Draft Final Proposal please select one of the following options to indicate your organization's overall level of support for the CAISO's proposal:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal.

If you choose (3) please explain why you oppose the proposal.

Topic 1 – Affected Systems

Sempra USGP opposes the proposal to allow Affected Systems (AS) to identify themselves outside the 60 day timeline. Interconnection stakeholders have expressed a strong preference for certainty in the interconnection process, and the prior CAISO proposal provided a measure of certainty in the form of a defined window during which potentially affected systems could identify themselves for further study by interconnectors. In the latest final draft proposal, the CAISO would instead diminish that certainty by allowing affected systems to identify themselves at any time in the process, in response to “changed facts or circumstances”.

However, any changes in relevant facts or circumstances are already addressed by the interconnection request process, and therefore, a re-opening of the AS window is not necessary or warranted. With respect to changes in the interconnection request itself, interconnectors have only limited opportunities to alter the characteristics of their request. For example, interconnectors can make changes such as an alternative Point of Interconnection, within 3 business days after the Scoping Meeting. At this point, the assumptions for interconnector’s Phase 1 study are finalized. Following the Phase 1 study, potentially Affected Systems are notified 90 days after the first financial posting. This allows interconnectors failing to make the financial posting to be eliminated from the scope of affected system evaluation. If an interconnector requests a change outside of this process, the CAISO performs a Material Modification Assessment (MMA) and if material, the request is denied and no change to the interconnection occurs. Finally, if the change in fact or circumstance relates to the topology of the CAISO grid or other interconnected balancing authority, the WECC transmission planning process would effectively address the change as it relates to potentially affected systems.

Therefore, in view of the interconnection process, timeline, and protections already in place, a catch-all provision for AS to identify themselves due to a “change in fact or circumstance” is not needed, and would unreasonably increase uncertainty for interconnectors in the process. Further, the proposed extension of the AS window from 30 to 60 days provides adequate time for potentially affected systems to verify the facts and circumstances associated with the interconnection request.

Topic 2 – Time-In-Queue Limitations

Topic 3– Negotiation of Generator Interconnection Agreements

