

## Stakeholder Comments Template

### Subject: Generator Interconnection Procedures Straw Proposal and Meeting

Submitted by	Company	Date Submitted
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This template was created to help stakeholders submit written comments on topics related to the May 26, 2010 Generator Interconnection Procedures Straw Proposal and June 3, 2010 Generator Interconnection Procedures Stakeholder Meeting. Please submit comments and thoughts (in MS Word) to [dkirrene@caiso.com](mailto:dkirrene@caiso.com) no later than the close of business on June 21, 2010.

Please add your comments where indicated responding to the questing raised. Your comments on any other aspect of the proposal are also welcome. The comments received will assist the ISO with the development of the Draft Final Proposal.

#### Proposed Independent Study Process

1. Do you think that the proposed independent study process criteria are appropriate?

Criterion (a)(2), "a determination that all of the required Reliability Network Upgrades can reasonably be completed by the desired COD" seems impossible to achieve without doing the studies.

Criterion (c), demonstration of a PPA should be eliminated. It can be difficult to complete PPA negotiation without knowledge of system upgrade costs. Moreover, the proposed Independent Study Process should not be restricted to generation projects with completed bilateral agreements.

The balance of the criteria appear reasonable.

2. How should the proposed independent study process be specifically modified to incorporate desired features that are in the current SGIP serial process?

SPI has no opinion.

3. How can the independent study criteria be modified to allow PTOs to utilize this process if they do not have a backlog and waiting for the cluster window does not make sense?

Relax criterion (b).

4. What pre-application information and guidance is needed to prequalify projects so that the process is not overwhelmed with applications?

The proposed criteria are likely sufficient to limit the number of projects able to qualify for the ISP. Additional deposits may also be a desirable screening tool (e.g. doubling the deposits for projects > 20 MW and applying the deposit requirements for projects > 20 MW to projects < 20 MW).

5. How much "ISO and PTO judgment" should be allowed in qualifying projects and how should it be delineated?

SPI has no opinion.

6. What would be sufficient transparency into the ISO and PTO judgment process in qualifying projects and how would that be provided?

SPI has no opinion.

7. If the proposed independent study process is included in the final proposal, is there still a need for the current LGIP Phase II accelerated study process? (CAISO Tariff Appendix Y Section 7.6)

SPI has no opinion.

#### Proposed Study Deposit Amounts

Are the proposed study deposit amounts appropriate, if not please explain?

SPI does not take issue with the deposit amounts, however the deposit amount differentiation between, for example a 19.5 MW project and a 20.5 MW project appear, on the surface to be arbitrary given that the study requirements for each of these projects to attain Deliverability status is, to our understanding, identical. Generally, we view these deposits as a very practical screening tool.

#### Proposed Cluster Study Process

Do the proposed timelines for the cluster study process seem reasonable? Please add explanations for both yes or no responses?

SPI is a forest products manufacturing company that develops biomass cogeneration projects as an efficiency adjunct to its manufacturing process. The study process appears to be quite long under any reasonable set of circumstances.

#### Coordinating generator interconnections with the transmission planning process

Do you support the concept of coordinating the proposed generator interconnection process with the transmission planning process, why or why not?

SPI has no opinion, provided that such coordination does not impede SPI's ability to and interconnection with FC status.

#### Deliverability Assessments

1. What are your thoughts on the proposed alternatives for deliverability assessments?
2. What adjustments should be made to each alternative?

SPI has no opinion, provided that accommodation for projects that initially chose EO as a shortcut to a full deliverability study does not delay our ability to attain full deliverability status.

#### Proposed Transition Plan

1. Do you think that the proposed transition plan is reasonable for LGIP projects?  
SPI would prefer it to be quicker. As stated above, the study process appears to be quite long.
2. Do you think that the proposed transition plan is reasonable for SGIP projects?  
SPI has no opinion.
3. Do you have any comments on the proposed dates for grandfathering projects in queue and migration of new projects and in queue projects into the proposed cluster process?

SPI has no opinion other than our general view that we would like to see the process move more quickly .

Do you have any additional comments that you would like to provide?

SPI appreciates the opportunity to participate in this GIP reform process and hope our comments will help the CAISO develop a process that will harmonize the development schedules of renewable generation project with the FC interconnection determination and agreement process.

We will build our project. The only outstanding question is whether the interconnection process will provide interconnection study results earlier enough to accommodate our currently planned online date.