

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Bonnie S. Blair bblair@thompsoncoburn.com 202.585.6905 Margaret E. McNaul mmcnaul@thompsoncoburn.com 202.585.6940	Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the “Six Cities”)	Feb. 28, 2014

Please use this template to provide your comments on the Interconnection Process Enhancements (IPE) Revised Straw Proposal for Topics 4, 5, and 13 posted on February 5 and as supplemented by the presentation and discussion during the February 13 stakeholder meeting.

Submit comments to GIP@caiso.com

Comments are due February 28, 2014 by 5:00pm

The Revised Straw Proposal for Topics 4, 5, and 13 posted on February 5 may be found at:

http://www.caiso.com/Documents/RevisedStrawProposal_Topics4-5-13_InterconnectionProcessEnhancements_020514.pdf

The presentation discussed during the February 13 stakeholder meeting may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancements-RevisedStrawProposal-Topics4-5-13.pdf

Please provide your comments on the ISO’s proposal for each of the topics listed below.

Topic 4 – Improve Independent Study Process

Please comment on the ISO’s proposed enhancements to improve the independent study process in each of the following four areas:

- Criteria for ISP eligibility.

- Process and timeline enhancements.
- Tests for electrical independence.
- Clarification on behind-the-meter (“BTM”) expansion and its impact on net qualifying capacity “NQC”).

Comments: **The Six Cities have no comments on the ISO’s revised straw proposal for this topic at this time.**

Topic 5 – Improve Fast Track

Note: The ISO’s revised straw proposal consists of two parts: (1) revisions to the fast track screens, processing fees, and the supplemental review timeline; and (2) compliance with FERC Order 792.

Please comment on the ISO’s proposed revisions to improve the fast track process including revisions to the fast track screens, processing fees, and the supplemental review timeline.

Please comment on the ISO’s proposal to comply with FERC Order 792 in each of the following areas:

- Pre-application report process
- Fast track eligibility
- Customer options meeting and supplemental review process
- Opportunity to submit comments on any required upgrades in the facilities study
- Account for the interconnection of storage devices under small generator interconnection procedures
- Require ICs wishing to interconnect using network resource interconnection service to do so under the LGIP

Comments: **The Six Cities have no comments on the ISO’s revised straw proposal for this topic at this time.**

Topic 13 – Clarify timing of transmission cost reimbursement

Note: Based on stakeholder feedback, the ISO is offering two alternative straw proposals for stakeholder consideration and requests stakeholders to comment on the pros and cons and their preferences relative to each option.

Please comment on Option A.

Comments: **As a general matter, reimbursement for network upgrades should commence after (i) the project (or phase of a project) has achieved commercial operation; and (ii) all of the associated network upgrades are in service. Option A appears to be most consistent with this approach, and the Six Cities therefore support Option A. It appears that Option A would address the concern with Participating TOs holding interconnection customer funding for an unduly long period of time pending completion of all network upgrades associated with a project, while ensuring that reimbursement is only being provided for facilities that are used and useful in delivering the output of an interconnection customer’s generating facility.**

Please comment on Option B.

Comments: **The Six Cities do not support Option B. As discussed by the ISO, Option B could result in reimbursement for network upgrades that are not in service at the time the interconnection customer’s project (or phase of a project) enters commercial operation. This is contrary to the principle that, as a prerequisite for reimbursement, network upgrades actually be available for use in delivering the output of an interconnection customer’s generating facility.**