

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) Revised Straw Proposal that was posted on May 11, 2015 and as supplemented by the presentation and discussion during the May 18, 2015 stakeholder meeting.

Submit comments to initiativeComments@caiso.com

Comments are due June 1, 2015 by 5:00pm

The Revised Straw Proposal posted on May 11, 2015 may be found at:

[http://www.caiso.com/Documents/RevisedStrawProposal InterconnectionProcessEnhancements2015.pdf](http://www.caiso.com/Documents/RevisedStrawProposal%20InterconnectionProcessEnhancements2015.pdf)

The presentation discussed during the May 18, 2015 stakeholder meeting may be found at:

[http://www.caiso.com/Documents/Agenda-Presentation InterconnectionProcessEnhancements2015.pdf](http://www.caiso.com/Documents/Agenda-Presentation%20InterconnectionProcessEnhancements2015.pdf)

For each topic that was modified in the Revised Straw 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

The Six Cities support the Revised Straw Proposal. As discussed on the May 18th stakeholder call, there is still a reference to the initially-proposed thirty-day response period in Section 3.7 of Appendix DD; this should be corrected to sixty days to fully reflect the ISO's proposal.

Topic 2 – Time-In-Queue Limitations

The Six Cities do not oppose the Revised Straw Proposal for this topic. However, the Six Cities note, as described in their prior comments, that there may still be an inconsistency in the proposed tariff language for the four sections impacted by the ISO's proposal. Specifically, the tariff language in Appendix Y as posted in the original Straw Proposal describes the Site Exclusivity requirement of Commercial Viability in more detail to include a demonstration of "Site Exclusivity for 100% of the property necessary to construct the facility and [that] the duration of Site Exclusivity extends at least to the Generating Facility's Commercial Operation Date specified in its Interconnection Request . . ." Appendices S, U, and DD only provide for a demonstration of "Site Exclusivity." Site Exclusivity is defined as (to paraphrase) rights to develop 50% of the property needed to construct the facility. (See ISO Tariff at App. A.) Thus, the proposed changes for Appendices S, U, and DD are substantively different from Appendix Y and, unless there is a reason that Appendix Y includes a more stringent Site Exclusivity requirement, the language for the four appendices should be reconciled so that it is consistent.

Topic 3– Negotiation of Generator Interconnection Agreements

The Six Cities support the Revised Straw Proposal for this topic, but propose clarifying edits to the draft language for Section 13.2:

The applicable Participating TO and CAISO and the Interconnection Customer shall negotiate concerning any disputed provisions of the appendices to the draft GIA for not more than one hundred twenty (120) calendar days after the Participating TO provides the Interconnection Customer and CAISO with the draft GIA. If the Interconnection Customer

determines that negotiations are at an impasse, it may request termination of the negotiations at any time after tender of the draft GIA ~~pursuant to Section 13.1~~. Upon such request, the Interconnection Customer shall, within seven (7) calendar days after requesting termination of the negotiations, either (i) request submission of the unexecuted GIA with FERC or (ii) initiate Dispute Resolution procedures pursuant to Section 15.5. If the Interconnection Customer requests termination of the negotiations, ~~but, within one hundred twenty (120) calendar days after the draft GIA was tendered pursuant to Section 13.1,~~ but fails to either (i) request either the filing of the unexecuted GIA within seven (7) calendar days or (ii) initiate Dispute Resolution procedures pursuant to Section 15.5 within seven (7) calendar days, it shall be deemed to have withdrawn its Interconnection Request. Neither the CAISO nor the Participating TO may declare an impasse before one hundred twenty (120) calendar days after the draft GIA was tendered. If the CAISO or the Participating TO declares an impasse, that party will file the GIA unexecuted with FERC. ~~Neither the CAISO nor the Participating TO may declare an impasse before one hundred twenty (120) calendar days after the draft GIA was tendered~~. Unless otherwise agreed by the Parties, if the Interconnection Customer has not executed and returned the GIA, requested filing of an unexecuted GIA, or initiated Dispute Resolution procedures pursuant to Section 15.5 within one hundred twenty (120) calendar days after issuance of the draft GIA, it shall be deemed to have withdrawn its Interconnection Request. The CAISO shall provide to the Interconnection Customer a final GIA within ten (10) Business Days after the completion of the negotiation process and receipt of all requested information.

Topic 5 - Stand-Alone Network Upgrades and Self-Build Option

The Six Cities support the changes made related to this topic in the Revised Straw Proposal.

Topic 10 - Forfeiture of Funds for Withdrawal During Downsizing Process

The Six Cities support the changes made related to this topic in the Revised Straw Proposal.

Topic 11 –TP Deliverability Option B Clarifications

The Six Cities do not oppose the changes made related to this topic.