

## 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) Issue Paper/Straw Proposal for Topics 1- 11 that was posted on March 23, 2015 and as supplemented by the presentation and discussion during the March 30, 2015 stakeholder meeting.

Submit comments to [initiativeComments@caiso.com](mailto:initiativeComments@caiso.com)

**Comments are due April 10, 2015 by 5:00pm**

The Issue Paper/Straw Proposal for Topics 1- 11 that was posted on March 23, 2015 may be found at:

[http://www.caiso.com/Documents/IssuePaper-StrawProposal\\_InterconnectionProcessEnhancements2015.pdf](http://www.caiso.com/Documents/IssuePaper-StrawProposal_InterconnectionProcessEnhancements2015.pdf)

The presentation for the March 30, 2015 stakeholder meeting is available on the ISO website at: [http://www.caiso.com/Documents/Agenda-Presentation-InterconnectionProcessEnhancements2015\\_IssuePaper-StrawProposal.pdf](http://www.caiso.com/Documents/Agenda-Presentation-InterconnectionProcessEnhancements2015_IssuePaper-StrawProposal.pdf)

For each topic, 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 Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the “Six Cities”) support with qualification the ISO’s proposal with respect to Topic 1 – Affected Systems. At page 11 of its Interconnection Process Enhancements Issue Paper/Straw Proposal (“IPE Issue Paper/Straw Proposal”), the ISO proposes that a timeline should be established for an electric system operator to affirmatively respond to a notice from the ISO that it is potentially affected by an Interconnection Request that it is an Affected System. In its edits to Section 3.7 of Appendix DD of its Tariff, the ISO proposes that “[i]f an electrical system operator does not make an affirmative representation within thirty (30) calendar days of notification, the CAISO will assume that the electric system is not an Affected System.”

The Six Cities believe that the concept reflected in the ISO’s proposed revision is reasonable, but the time allowed for an affirmative representation is insufficient. Rather than allowing only 30 calendar days for an affirmative response to a notice from the ISO that a system is potentially affected by an Interconnection Request, the Six Cities request that the ISO modify this Tariff provision to allow 90 days for a response before an electric system is deemed not to be an Affected System. A 90-day time period would allow an electric system operator to review the Interconnection Request and conduct studies to determine whether its system is an Affected System. The ISO’s proposal does not allow sufficient time to conduct this analysis.

### **Topic 2 – Time-In-Queue Limitations**

The Six Cities support with qualification the ISO’s proposal with respect to Topic 2 – Time-In-Queue Limitations. With respect to this topic, the Six Cities identified an inconsistency in the proposed Tariff language in subsection “c” under the Commercial Viability sections of the various appendices. Specifically, while the ISO proposes that Appendices S, U, and DD state that “Commercial viability shall be defined as . . . c. Demonstrating Site Exclusivity in lieu of any Site Exclusivity Deposit,” the proposed language for Appendix Y states:

Commercial viability shall be defined as . . . c. Demonstrating Site Exclusivity for 100% of the property necessary to construct the facility and the duration of Site Exclusivity extends at least to the Generating Facility’s Commercial Operation Date specified in its

Interconnection Request; a Site Exclusivity Deposit is not sufficient to satisfy this criteria.

Based on feedback received from the ISO on the March 30<sup>th</sup> stakeholder conference call, the Six Cities understand that this inconsistency was in error, and the ISO plans to address it in the next iteration of proposed Tariff language. While the ISO explained that Appendix Y would be modified to match the language used in Appendices S, U, and DD, the Six Cities propose instead that Appendices S, U, and DD be modified to match the more extensive language included in Appendix Y, which states with more clarity the criteria for demonstrating site exclusivity for the purposes of showing commercial viability.

### **Topic 3– Negotiation of Generator Interconnection Agreements**

The Six Cities support with qualification the ISO’s proposal with respect to Topic 3 – Negotiation of Generator Interconnection Agreements. The ISO’s proposed edits to Section 13 of Appendix DD, at page 22 of the IPE Issue Paper/Straw Proposal, are incomplete and require clarification. Specifically, in proposed Section 13.2 (Negotiation), the ISO deletes language that explains what happens if the Interconnection Customer fails to either request submission of an unexecuted Generation Interconnection Agreement (“GIA”) or initiate Dispute Resolution procedures after the Interconnection Customer and Participating TO reach an impasse. Prior to the current round of proposed edits, if the Interconnection Customer had not, within 120 days, “executed and returned the GIA, requested filing of an unexecuted GIA, or initiated Dispute Resolution procedures,” its Interconnection Request would be deemed withdrawn. This prior version of the Tariff language provided a full picture of what happens after an impasse is reached in the negotiation process, while ISO’s proposed Tariff language creates a gap in the procedure.

The Six Cities understand that the ISO recognizes that this gap exists and request modification of the proposed Tariff language to provides clarity as to what would happen should an Interconnection Customer fail to take action after an impasse.

### **Topic 4 -Deposits**

The Six Cities do not oppose the ISO’s proposal with respect to Topic 4, including the subtopics listed below.

#### ***Interconnection Request Study Deposits***

#### ***Limited Operation Study Deposit***

#### ***Modification Deposits***

#### ***Repowering Deposits***

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

The Six Cities do not oppose the ISO's proposal with respect to Topic 5.

**Topic 6 - Allowable Modifications Between Phase I and Phase II Study Results**

The Six Cities do not oppose the ISO's proposal with respect to Topic 6.

**Topic 7 – Conditions for Issuance of Study Reports**

The Six Cities do not oppose the ISO's proposal with respect to Topic 7.

**Topic 8 - Generator Interconnection Agreement Insurance**

The Six Cities do not oppose the ISO's proposal with respect to Topic 8.

**Topic 9 -Interconnection Financial Security**

The Six Cities do not oppose the ISO's proposal with respect to Topic 9, including the subtopics listed below.

***Process Clarifications***

***Posting Clarification***

**Topic 10 - Forfeiture of Funds for Withdrawal During Downsizing Process**

The Six Cities do not oppose the ISO's proposal with respect to topic 10. However, it is not clear how the ISO plans to allocate forfeited Generator Downsizing Deposits. Therefore, the Six Cities request that the ISO provide information regarding the status of its consideration of how forfeited deposits will be allocated, both with regard to Generator Downsizing Deposits and to other deposits supplied as part of the interconnection process.

**Topic 11 –TP Deliverability Option B Clarifications**

The Six Cities do not oppose the ISO's proposal with respect to topic 11.