Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Issue Paper & Straw Proposal posted on June 24, 2014 in the Energy Storage Interconnection initiative and as supplemented by the presentation and discussion during the stakeholder web conference held on July 1, 2014.

Submit comments to EnergyStorage@caiso.com

Comments are due July 15, 2014 by 5:00pm

The Issue Paper & Straw Proposal posted on June 24, 2014 may be found at:

http://www.caiso.com/Documents/IssuePaper_StrawProposal-EnergyStorageInterconnection.pdf

The presentation discussed during the July 1, 2014 stakeholder web conference may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-EnergyStorageInterconnectionJul1_2014.pdf

Please provide your comments in each of the topic areas listed below.

Applying the GIDAP to Cluster 7 energy storage projects

The ISO invites stakeholders to comment on its proposed approach for the application of existing GIDAP rules to energy storage projects in Cluster 7 (e.g., that existing GIDAP rules can accommodate Cluster 7 storage projects that want to be treated as generators for both aspects

of their operation; how reliability and deliverability studies will be performed; that GIDAP will not be utilized to assess requests to obtain a higher level of service for charging mode; and, the process for interconnection customers to seek such firm load service from the PTO through means other than the GIDAP). Stakeholders are asked to identify any issues with this approach for Cluster 7 and to suggest potential alternatives.

Comments: **As a general matter, the Cities support treating storage resources comparably to generation resources for interconnection study purposes, at least as to the discharging function. The Six Cities do not have specific comments to offer on other aspects of the Issue Paper and Straw Proposal at this time, although they look forward to the next version of the ISO's straw proposal and may comment substantively at that time, particularly on issues related to costs for the storage resource charging function.**

Issues in scope for this initiative

Beyond Cluster 7, the ISO anticipates that it will receive further requests to interconnect energy storage projects in the Cluster 8 application window that will close April 30, 2015. Through this initiative, it may be possible to identify improvements that could be implemented prior to the Cluster 8 window so that those improvements can be applied to projects in that cluster. Toward this goal, the ISO has identified the following three issue areas as in scope and invites stakeholders to comment on these.

- Interconnection request process. The objective is to ensure a one-stop, streamlined process for interconnecting energy storage to the ISO grid. Consolidation of all aspects (i.e., impacts of both discharging and charging) of energy storage interconnection under the GIDAP will be explored. Stakeholders are asked to explain where process improvements are most needed and could be most beneficial, and to suggest potential improvements.

  Comments: **The Six Cities have no comments on this topic at this time.**

- Interconnection study process. The objectives are to: (1) examine the alignment between the methodologies used in ISO interconnection studies (e.g., reliability, deliverability) and the energy storage configurations and use cases, and (2) determine whether any changes can or should be made to these methodologies. Although the ISO is not making any commitments as to the extent of any changes that may be made to

these methodologies (again, both reliability and deliverability), the ISO is open to this examination and is inviting stakeholder input. Stakeholders are asked to explain how current interconnection study methodologies may not align with energy storage use cases and to suggest potential alternatives for how these studies could be performed. Given that the current deliverability study methodology is aligned with existing resources adequacy rules, stakeholders are asked to suggest how these studies could be performed if those rules are assumed to change.

Comments: **The Six Cities have no comments on this topic at this time.**

- Project modification process. The objective is to examine whether any further changes (to the two existing project modification processes discussed in the paper: the modification request process and the independent study behind-the-meter expansion process) can or should be made given that developers may want to modify projects (e.g., to add energy storage to a renewable project) either still in queue or those is commercial operation. Although the ISO is not making any commitments as to the extent of any changes that may be made to these existing project modification processes, the ISO is open to this examination and is inviting stakeholder input. Stakeholders are asked to explain how these existing processes may not provide adequate means for requesting project modifications, and are asked to describe changes that could be made or suggest potential alternatives to these processes.

  Comments: **The Six Cities have no comments on this topic at this time.**

A framework for differentiating between energy storage configurations

Although the ISO has identified the range of configurations that may be possible, due to time constraints the ISO is concerned that inclusion of all possible configurations in this initiative may jeopardize the goal of identifying GIDAP improvements that could be implemented prior to the Cluster 8 window. Thus, the ISO is recommending that this initiative focus solely on ISO grid connected storage configurations (and not distribution connected and customer sited). The ISO believes that solutions developed for ISO grid connected storage configurations will likely inform solutions for distribution connected and customer sited configurations (e.g., where appropriate, conforming changes could be made to distribution utility WDATs). Consistent with this approach, the ISO asks stakeholders to identify energy storage interconnection issues or challenges associated with ISO grid connected configurations (e.g., where the current

interconnection rules may either fail to address or conflict with the needs of storage projects) and to make proposals for addressing these issues.

Comments: **The Six Cities have no comments on this topic at this time.**