

Stakeholder Comments Template

Subject: Modifications to the Small Generator Interconnection Procedures Issues Paper 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 April 1, 2010 Modifications to the Small Generator Interconnection Procedures Issue Paper and April 12, 2010 Small Generator Interconnection Procedures Stakeholder Meeting. Please submit comments and thoughts (in MS Word) to dkirrene@caiso.com no later than the close of business on April 27, 2010.

The ISO is interested in knowing the importance and urgency of the issues identified through this stakeholder process. The issues identified below are further described in the Issues Paper. Please rate the importance of each issue as high, medium or low by checking the check box. In addition, please identify the urgency for getting each of the identified issues resolved. Check the urgent check box for issues that should be resolved in a FERC filing this year. Check the not urgent check box if the issue could be resolved beyond year-end. The information provided will assist the ISO in determining the scope of this stakeholder effort.

Study Process Issues		
	Importance	Urgency
2.1.1 Time required for the SGIP study process	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.2 SGIP serial study process coordination with the studies under the large generation interconnection procedures (LGIP)	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.1.3 Avoiding delays caused by the increasing volume of SGIP projects	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.4 Detail and necessity of the feasibility study	<input type="checkbox"/> high <input type="checkbox"/> medium <input checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent

2.1.5 Interconnection request data requirements	<input type="checkbox"/> high <input type="checkbox"/> medium <input checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.1.6 Should the SGIP accommodate re-studies?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.7 Availability of the current base case data for use by project developers	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.8 Delays and uncertainty in study results caused by projects that withdraw	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:		
Solution Ideas:		
Deliverability Issues Related to Interconnecting Small Generation		
2.2.1 Should SGIP have an option for deliverability?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.2.2 Should there be an opportunity to have "partial deliverability"?	<input type="checkbox"/> high <input type="checkbox"/> medium <input checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.2.3 Should there be a later opportunity to change deliverability status after generator is commercially operational?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.2.4 How would a change in policy affect existing generation and/or existing projects in the queue?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	Deliverability is the most important issue in the questionnaire	
Solution Ideas:	Allow SGIP projects to proceed to a phase 2 LGIP cluster for delivery after facility analysis and develop appropriate study cost.	
Issues relating to Cost Certainty		
2.3.1 Developers desire cost certainty	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.3.2 How to minimize the impacts caused by projects that drop out of the queue?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.3.3 Accuracy of the per unit construction cost	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent

estimates		
2.3.4 Effects of adding cost certainty measures to the overall SGIP timeline	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:		
Solution Ideas:		
Issues related to Eligibility Criteria		
2.4.1 LGIP projects broken up into multiple SGIP projects	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.4.2 Real vs. Speculative projects	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.4.3 Generation MW size	<input type="checkbox"/> high <input type="checkbox"/> medium <input checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.4.4 MW Increases to existing projects	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.4.5 Site Control	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
Comments:	Speculative projects unfairly impact investments in real projects in either cost or time delays.	
Solution Ideas:	Current Site Control Policy appears to deal with the issue pretty effectively.	
Issues related to application and study fees		
2.5.1 Appropriateness of amount	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
Comments:	Fees should be cost-based. Not based upon artificial incentives.	
Solution Ideas:		
Small Generator Interconnection Agreement Issues		
2.6.1 Pace of SGIA completion	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.6.2 Detail of the SGIA	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
Comments:	Level of detail appears to be adequate.	
Solution Ideas:		
Miscellaneous SGIP tariff issues		
2.7.1 Detail of the SGIP tariff	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent

2.7.2 Clarity of SGIP tariff definitions	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:		
Solution Ideas:		
Additional Issues that should be considered		
<i>Please include additional issues here.</i>	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:		
Solution Ideas:		

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