

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 type="checkbox"/> high <input checked="" 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 checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input 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 checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent

2.1.5 Interconnection request data requirements	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.1.6 Should the SGIP accommodate re-studies?	<input type="checkbox"/> high <input type="checkbox"/> medium <input checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.1.7 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:	The SGIP studies should take no more than one year.	
Solution Ideas:	Cluster SGIP studies and coordinate them with (or perform them after) LGIA Phase II study Feasibility Studies should be retained, but make them quick and simplified. Use a viability screen and/or financial security obligation along with interconnection cost certainty and clustering to avoid the need for re-studies.	
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 checked="" type="checkbox"/> urgent <input 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 type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	Encourage deliverability Generators need to be able to get approval for the cost of deliverability upgrades before they are required to commit to those costs.	
Solution Ideas:	Do a pass/fail deliverability assessment with no incremental upgrades for every SG IR. Provide process for proposed and existing WDAT projects to get deliverability.	

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 type="checkbox"/> high <input checked="" 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 estimates	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent	<input checked="" type="checkbox"/> not urgent
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:	Cost certainty is required before commitment for financial security. Accuracy is affected by study methodology, particularly representation of other queued generators.		
Solution Ideas:	Cluster studies should not represent more generation than needed to cover the LSEs' net short amounts. A viability test and/or financial security requirement to reduce the queue size will help study accuracy.		
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 checked="" type="checkbox"/> urgent	<input 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 checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent	<input type="checkbox"/> not urgent
2.4.4 MW Increases to existing projects	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent	<input type="checkbox"/> not urgent
2.4.5 Site Control	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent	<input type="checkbox"/> not urgent
Comments:	The SGIP should be a quick process—including the time allowed to proceed to construction.		
Solution Ideas:	There should be a viability test or financial security requirement for a Facilities Study. SGIA milestones should be enforced fairly rigidly. The SGIA should limit the time for the IC to submit the notice to proceed.		
Issues related to application and study fees			
2.5.1 Appropriateness of	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent	<input type="checkbox"/> not urgent

amount		
Comments:	NextLight supports higher deposits and/or a viability test	
Solution Ideas:	A viability test is a potential alternative to higher deposits or financial security requirements.	
Small Generator Interconnection Agreement Issues		
2.6.1 Pace of SGIA completion	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" 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 checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:		
Solution Ideas:		
Miscellaneous SGIP tariff issues		
2.7.1 Detail of the SGIP tariff	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.7.2 Clarity of SGIP tariff definitions	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
Comments:	A 3 year extension/suspension period is much too long.	
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?