

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Wellhead supports the CAISO effort to continue to improve the Interconnection Process and offers the following comments.

There are two suggestions/modifications Wellhead has to the latest proposal.

First, the Affected Systems should be required to provide some information as to the reasons they believe they will be impacted. Without this requirement, the change is likely to result in all Affected Systems simply saying “yes” within the 30-day window meaning the modification will have accomplished little. A possible alternative would be to require the Affected System to hold a scoping meeting within 30-days of being notified by the CAISO for a cost-based fee.

Second, the interconnection process would be much better aligned with the reality of project development if projects selecting Type A and only needing deliverability (project that will only get developed if they have a PPA and deliverability allocation) were able to “park” and enter Phase 2 of any subsequent cluster during the window between Phase 1 and Phase 2 (i.e. they would have the Phase 1 cost estimates and 50% of their interconnection request deposit when they go into the appropriate Phase 2 study). In implementing this, the CAISO should consider requiring projects to select Type A or B in their initial Interconnection Request. This would potentially simplify the Phase 1 studies because deliverability network upgrades would only have to be studied for Type B projects that would be continuing through Phase 2 (because they are going to be developed as a merchant facility on the schedule proposed in the IR).

The implementation details of these two changes can be very straight forward and will make further progress in aligning the interconnection process with development realities.