

Stakeholder Comments Template

Subject: Generator Interconnection Procedures Straw Proposal and Meeting

| Submitted by | Company | Date Submitted |
|------------------------|--------------------------------------|----------------|
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Proposed Independent Study Process

enXco requests more clarity on the IPSs requirements, especially on the electrical independence requirement. One suggestion is to limit this IPS option to smaller projects, below 20MW, for the first two years to limit the number of IRs requesting IPS and to help ensure a faster study process. Larger projects would already be receiving a significant benefit from the proposed shorter timelines. This below 20MW limit for the first two years would allow the continuation of the SGIP, in a modified form, for a small subset of projects that the GIP cluster-study timeline won't meet the desired COD.

enXco also wants clarity on the option of the CPUC to designate a project for independent study. We see the potential of independent study to prioritize projects that have entered into agreements to build and sell power or have the ability to self-finance, which in turn enables getting projects completed. However, there are possibilities for gaming. The CPUC option requires clarification, particularly in the context of the potential benefits and problems mentioned above.

Proposed Study Deposit Amounts

enXco recommends lowering the deposit for existing EO projects and EO projects in the queue.

Existing EO projects and EO projects in the queue have already paid the study deposit in their initial interconnection application and should be charged a lower fee than a new interconnection application.

| <i>Adding deliverability for projects in the queue or existing projects</i> | <i>DEPOSIT REQUIRED</i> |
|--|----------------------------------|
| | <i>STUDY</i> |
| Fast Track (2MW max)- RA Addition | \$1,500 |
| Full Capacity- RA Addition | \$10K + \$1K per MW; \$100K max. |

enXco recommends a base and per MW fee instead of the flat fees for study deposits. The current proposed flat fee without a per MW fee encourages developers to propose the largest project size allowed for the lower fee, 20MW, instead of an optimal size based on site constraints and other factors. The base and per MW fee encourages developers to “right size” projects upfront.

| INTERCONNECTION REQUEST TYPE | DEPOSIT REQUIRED | |
|-------------------------------------|-------------------------------------|---------------------------------|
| | STUDY | “IN-LIEU,” if applicable |
| Fast Track IR (2MW max) | \$1,500 | N/A |
| Cluster Study ≤20 MW | | |
| Energy Only IR | \$20K + \$1K per MW; \$150K max. | Same as Study Deposit |
| Full Capacity IR | \$30K + \$1,500 per MW; \$250K max. | |

Deliverability Assessments

- a. enXco supports existing EO projects and EO projects in the queue, having to apply for FC to be awarded FC. We understand that the overall process to get deliverability may be different for existing EO projects and EO projects in the queue. Under the current Alternative 1 there is not an application process, so existing EO projects with no use for RA would be awarded RA and impair deliverability awards to those projects that do want such awards.
- b. enXco recommends a fast track RA Addition for projects up to 2MW and the same \$1,500 deposit fee so that up to 2MW projects are not burdened with an up to 420 day process and large deposit fees.

Proposed Transition Plan

enXco wants to ensure that projects in the queue would be able to apply for adding deliverability even if their interconnection agreement is not yet executed. To have to wait for the interconnection agreement to be executed, then the cluster open window, then up to 420 day process is too long.