

BAMx Comments on the CAISO 2013 Interconnection Process Enhancements Scoping Proposal

The Bay Area Municipal Transmission group (BAMx)¹ appreciates the opportunity to comment during the development of the CAISO's 2013 Interconnection Process Scoping Proposal. The comments below are in response to the Scoping Proposal document posted on the ISO's website on April 8, 2013 and reviewed during the April 22nd Stakeholder conference call.

Queue Management Topics

BAMx appreciates the CAISO staff efforts in pursuing additional tools as may be needed to managing the CAISO queue process. We note that many of the proposed initiatives focus on items that improve the logistics and process flow of the GIP activities. Nonetheless there are several topics that may allow the CAISO to more effectively manage the length of the queue and hasten the alignment of commercially viable generation projects with transmission system interconnection. We believe it is important for the CAISO continue to look for ways to remove projects from the queue that are not making satisfactory progress towards commercial operation so that viable projects further down the queue can obtain an interconnection on a timely basis. So we encourage the CAISO to keep such efforts within the scope of this initiative and to continue to look for ways to make improvements.

Reform of GIP Reliability and Deliverability Methodology

While we understand the CAISO's preference is to keep this issue bifurcated from the GIP reform, we are concerned that such separation keeps this review of the CAISO's Deliverability Methodology and the resultant information available to decision makers on a slower schedule to resolution. BAMx would support a separate initiative to allow greater focus if it also were accompanied by a specific work plan and schedule to drive it to resolution. Unfortunately this has not been the case to date and progress on this important issued has lagged while billions of dollars are or will be spent on transmission system upgrades based upon findings supported by this methodology. As the window of opportunity for meaningful reform narrows as more transmission projects move beyond the planning and permitting stage, this topic should be elevated in the discussion of GIP enhancement. As the ratepayer benefits of even small incremental improvements would outweigh the value of all other Queue Management Topics

¹ BAMx consists of Alameda Municipal Power, City of Palo Alto Utilities, and City of Santa Clara, Silicon Valley Power.

combined, if moving this topic into the GIP enhancement process is necessary to move it forward, then that is what should be done.

If you have any questions concerning these comments, please contact
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