

Stakeholder Comments Template

Integration of Transmission Planning and Generator Interconnection Procedures (TPP-GIP Integration)

Second Draft Tariff Language, posted April 19, 2012

Submitted by	Company	Date Submitted
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In the CAISO's Final Proposal on Integration of Transmission Planning and Generator Interconnection Procedures (TPP- GIP Integration) dated March 9, 2012, the CAISO stated the following under Section 5.1 (Treatment of and cost responsibility for local delivery network upgrades (LDNU) and reliability network upgrades (RNU))

“...In response to these concerns the ISO now proposes the following:

In the allocation of TP deliverability, for situations where the available amount of TP deliverability can accommodate only one out of two or more generating projects requesting TP deliverability that all score equally on the ranking criteria, the ISO will allocate the TP deliverability to the project with the lowest LDNU costs.”

We note that this key cost containment element of the TPP-GIP Integration initiative is completely missing in the Second Draft Tariff language dated April 19, 2012. We believe that the above language needs to be appropriately included in Section 8.9.2 (Second Component: Allocating TP Deliverability To The Current Queue Cluster) of the newly proposed Appendix DD *Generator Interconnection and Deliverability Allocation Procedures* (GIDAP) of the CAISO tariff. Please include it in the next draft of the tariff language.

