

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Interconnection Process Enhancements Scoping Proposal posted on April 8 and supplemented by the presentation discussed during the April 22 stakeholder web conference.

Submit comments to GIP@caiso.com

Comments are due April 30, 2013 by 5:00pm

The Scoping Proposal posted on April 8 may be found at:

<http://www.caiso.com/Documents/ScopingProposal-InterconnectionProcessEnhancements.pdf>

The presentation discussed during the April 22 stakeholder web conference may be found at:

http://www.caiso.com/Documents/Agenda-Presentation-ScopingProposal-InterconnectionProcessEnhancementsApr22_2013.pdf

Part 1

Please provide your feedback on the 12 topics initially proposed to be in scope in the April 8th Scoping Proposal by responding to the following:

1. *If you believe that one or more of these 12 topics should not be in scope, identify those and provide a detailed explanation of why – **Given the scarce resources available to all parties in this proceeding, CalWEA believes that the focus of this stakeholder process should primarily be on the high priority topics remaining from the GIP 3 reform process – i.e., only topics 1 through 5 on the CAISO list, including closely related items from the summary of topics recently proposed by stakeholders. The unvetted topics 6 through 12 are mainly of a procedural nature apparently needed to improve management of the queue by the CAISO and PTOs. They do not address significant problems that CAISO customers continually face.***

2. *If you believe that the description of a topic (i.e., one of the 12) is not accurate, provide your preferred description of the topic – CalWEA agrees with all the descriptions offered by the CAISO.*

Part 2

Please select five topics of greatest importance to you from (i) the 49 topics included in the April 8th Scoping Proposal and (ii) any additional generation interconnection process related topics not already included in the 49 topics, and rank them in order of importance using the table provided below (a rank of “1” being most important). Note: Numerical rankings are informative but the detailed explanations you provide below the table will be critical for the ISO as we assess the scope of this initiative.

Top 5 topics selected by stakeholder

Topic No. <i>(if one of the 49 topics; otherwise use N/A)</i>	Topic Name <i>(either the topic name used in the Scoping Proposal or, if a new topic provide your own name for the topic)</i>	Rank
1 & 2 and as relates to 31 & 32	Future downsizing policy and disconnection of first phase of project for failure of second phase and as relates to Partial Termination options & criteria (topics 31 & 32). These topics should be considered as one, since they are too interrelated to consider separately.	1
25	Behind the meter expansion	2
16	Increases to project MW size should be allowed as long as there are not material impacts to other projects in queue	3
N/A	Streamlined material impact review for repowering existing generating plants	4
4 & 5	Improve the Independent and Fast Track Study Processes	5

Detailed explanations

1. Provide a detailed description of each topic. Use the topic description in the Scoping Proposal if you believe it is an accurate description of the issue; otherwise provide your preferred description of the topic. For new topics, provide your own detailed description.

- Topic 16 – Increases to project MW size should be allowed as long as there are not material impacts to other projects in queue. It is not uncommon that a generating facility wants to add capacity to an existing plant without having to go through the entire interconnection study process. Subject to specific technical and business limits to be defined as part this reform process, such increases should be allowed without having to ask that the capacity increase be taken through the entire cluster generation interconnection process. Perhaps capacity

additions could be managed through the improved Independent Study or the Improved Fast Track Study Processes.

- Topic 25 – Behind the meter expansion. CalWEA’s request here is in line with our same request during GIP 3 process. Per their business needs, our members need to be able to expand the capacity of their queued generation projects using complimentary technologies after completion of each phase of these projects using the CAISO BTM expansion tariff and without having to go through a formal interconnection study process.

- New Topic: CalWEA is proposing one new topic -- “Streamlined material impact review for repowering existing generating plants” -- as a high priority topic for this stakeholder process. Most wind projects built during the 1980s and early 1990s that have not already done so are expected to repower with modern technology over the next several years. This topic addresses an issue that they will commonly face as they replace their old, small, less efficient wind turbines with fewer, larger and significantly more productive wind turbines resulting in more efficient utilization of transmission assets. When total capacity remains the same, the only possible impact, given that “flow impacts” would not arise, is related to Short Circuit Duty (SCD) impact. However, since the number of generators in the repowered power plant is always reduced (often substantially) or in some cases at least remains the same, and the electronics in most new wind turbines work to limit the fault current contribution, the SCD of the resulting plant is always expected to be reduced. Hence, CalWEA proposes that the material impact review for such wind plant repowering be streamlined to simplify the process, as long as the customer verifies that the number of wind generators in the repowered wind plant will be reduced or stay the same, with improved generation technology. These criteria for streamlining should be published and repowering customers who follow them should automatically be approved based on a simple affidavit process.

2. *Provide a detailed explanation of the rationale for your selection of these five topics and your rankings* –As CalWEA frequently noted during the GIP 3 stakeholder process, establishing a rational process and criteria to allow any generation project in the CAISO queue to downsize its GIA capacity is not only a reasonable but a necessary GIP (or GIDAP) reform given the reality of the renewable energy supply and demand picture in California and the added emphasis on distributed renewable generation. We believe that very straightforward criteria could be established by the CAISO to allow such downsizing to take place on an ongoing basis without significant disruptions. CalWEA’s position on this matter has been very straightforward: If the downsizing project is willing to mitigate the material impact, if any, that its downsizing will trigger, it should be allowed to downsize. We believe that clear criteria for material impact mitigation can be readily established as part of this stakeholder process. CalWEA also believes that a downsizing project that fails to mitigate for the material impact of its action should

be penalized through the forfeiture of its financial security postings and not with termination of the GIA related to the completed portion of the project.

- 3. *Identify which of the 12 topics initially proposed to be in scope you recommend your selected topics should replace – CalWEA believes that none of the 7 topics (topics 3 and 6-12) that have been added to the GIP 3 stakeholder process list need to be treated as high priority topics for this stakeholder process. At the same time, we are hopeful that the long stalled process of reviewing the CAISO technical study process for deliverability assessment will soon be revived by the CAISO.***