

Stakeholder Comments Template

Subject: Generation Interconnection Procedures Phase 2 (“GIP 2”)

Submitted by	Company	Date Submitted
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The Clean Coalition respectfully submits the following comments on on GIP 2.

1. Errors and Omissions

A substantial error or omission shall mean an error or omission that results in one or more of the following:

- (i) understates the Interconnection Customer’s cost responsibility for either Network Upgrades or Participating TO Interconnection Facilities by more than five (5) percent or one million dollars (\$1,000,000), whichever is greater

Although the terms above make sense for the average, larger projects that typically interconnect via the CAISO, the Clean Coalition feels that a minimum threshold of \$1,000,000 is too high for smaller projects.

We recommend that a separate threshold be used for projects less than 20 MW. Based on our estimates of the difference in size between an average large generator project and small generator project, it seems reasonable that the threshold for smaller projects should be:

“For projects less than 20 MW, a substantial error or omission shall mean an error or omission that understates the IC’s cost responsibility for either Network Upgrades or PTO Interconnection Facilities by more than five (5) percent or \$200,000, whichever is greater”

2. Fast Track

Given recent conversations with the CAISO and public queue data, it is clear that the Fast Track process, as reformed in GIP 1, is not functioning. Due to flaws in the screens that apparently weren’t brought to light during the GIP process, all projects are failing to pass the screens. Therefore, we recommend that the CAISO modify the existing timelines until those Fast Track screens are fixed in GIP 3 or some other process.

Specifically, if it is already known that the screens cannot be passed as currently implemented, it does not make sense for the customer to wait for the following time periods:

- 15 Business Days (BDs) between when the CAISO deems an Interconnection Request complete and when the applicable Participating TO (PTO) performs the initial review using the Fast Track screens
- 5 BDs for the CAISO and PTO to notify the Customer that the Fast Track failed initial screens

Therefore, until the Fast Track screens are fixed, those 20 BDs should be ignored and the Customer should immediately receive, within 10 BDs, an offer to convene a customer options meeting.

We have also been informed that Fast Track applicants have been kept waiting far longer than provided in the CAISO tariff and we strongly urge CAISO to stick to the relevant timelines. Now that CAISO has learned more about the issues with the existing Fast Track screens, applicants should be informed as early as possible about their chances of passing or not passing the screens, and not made to wait many months for a negative (or hopefully positive) result.