

## Stakeholder Comments Template

### Subject: Remote Resource Interconnection Policy

Submitted by	Company	Date Submitted
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This template has been created for submission of stakeholder comments on the following topics covered in the June 1 Market Notice regarding Remote Resource Interconnection Policy. Upon completion of this template please submit (in MS Word) to [chinman@caiso.com](mailto:chinman@caiso.com). Submissions are requested by close of business on Friday June 13, 2007.

Please submit your comments to the following questions for each topic in the spaces indicated.

1. What is the minimum percentage of capacity of eligible projects that must be subscribed pursuant to executed Large Generator Interconnection Agreements before construction can commence?

Fifty Percent.

2. What are the appropriate criteria for demonstrating “additional interest” (i.e., interest more than the requisite minimum percentage of LGIAs) for an eligible project?

First, it should be clarified that these policies are being developed solely to access whether or not facilities are eligible for treatment as Third Category facilities. This discussion does not apply to high-voltage, networked transmission facilities that are already covered under the CAISO Tariff.

The appropriate criteria may include, but are not limited to, both the amount of additional interest, and the diversity of load serving entities that will be served by the additional remote resource capacity. This diversity is important because of the policy decision to roll a portion of the interconnection costs into a system-wide charge. If only one or two large entities are being served by the newly-interconnected generation, there is little justification to include these charges in the Transmission Access Charge.

3. What is the minimum percentage of “additional interest” that should be shown for an eligible project before construction can commence?

Twenty-five percent.

4. Do wheel-through customers receive benefits from a Remote Resource Interconnection Facility? Should the costs of a Remote Resource Interconnection Facility be included in wheel-through rates? Why or why not?

There are many factors that may be considered, including whether the wheel-through entities participate in other CAISO programs. Also, since one of the underlying rationales for this policy initiative was to further attainment of state policy goals, the CAISO should consider charging these costs to generators that inject into the grid as well.

5. What are the key elements of and considerations for a transmission planning process for the Remote Resource Interconnection Policy?

Remote interconnections should be considered in the planning process. Beyond that, CMUA has no position on this issue at this time.

6. What principles should be applied and factors considered to ensure that a proposed Remote Resource Interconnection Facility will result in a cost effective and efficient interconnection of resources to the grid?

Factors to include are: will the remote resource contribute to local and system capacity requirements in a significant way; are there other resources that can interconnect to the grid at these areas.

7. How should Energy Resource Areas be selected?

This is a significant issue that probably cannot be resolved within the CAISO itself. It may include relevant state agencies and Local Regulatory Authorities. Also, it may include FERC since the CAISO has used this definition in the CAISO Tariff to determine eligibility for rate treatment of certain interconnection facilities.

8. Should the CAISO consider tariff changes to its existing authority to "cluster" interconnection studies to enhance its ability to efficiently evaluate locationally-constrained resource areas.

CMUA has no comments at this time.

9. Other

Not at this time.