

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Steven Kelly, Director of Policy steven@iepa.com (916) 448-9499	Independent Energy Producers	April 30, 2013

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 –*

IEP appreciates the ISO's interest in queue management and the value that a realistic interconnection queue will bring to the interconnection study process as well as the TPP. The ISO signified the importance of this topic when it elected to place six queue management items in the short list of twelve proposed "in scope" topics. IEP also appreciates the inclusion of several topics that were highly ranked by stakeholders in the prior GIP improvement initiative. Four of the six queue management issues are defined by the ISO as requiring a low level of effort, and indeed at least one appears to be as "simple" as revising tariff/BPM language – perhaps without or with very minimal stakeholder interaction – to reflect the actual practice (i.e. PTO's tendering GIAs and not the ISO).

IEP is not suggesting any specific replacement of the twelve proposed topics by other topics currently out of scope. However, the “low” level of effort queue management topics appear to have the potential to be completed very quickly and that might afford the opportunity for other topics to come into consideration. Therefore, IEP suggests that the ISO carry forward a small subset of the currently out-of-scope topics to be staged as “on deck” issues in the event that time permits for them to be worked in this cycle of interconnection process enhancements. IEP also recommends that this suggested subset consist of topics whose capability for resolution may be improved by (a) one of the topics in the original 12 “in scope” items due to its related nature, and/or (b) a topic that was previously ranked high by stakeholder vote.

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 –*

IEP suggests the following modifications to the topic descriptions.

Topic #2 – Disconnection of first phase of project for failure of second phase

IEP suggests the following modification to the topic description (underlined):

“Source: This topic was suggested by Large-scale Solar Association, CalWEA, and Tenaska in March 2012 stakeholder survey. This topic was also recently proposed again by the Large-scale Solar Association (see topic #32 in section 4.2).

Stakeholder text: LGIA’s include provision for complete termination of the GIA if all phases of a generation project are not completed. The idea that a GIA could be fully terminated, even if part of a project is already operating, if a later phase or other portion of a project is cancelled, has caused severe financing problems.

ISO Comment: The ISO confirms that the tariff and current GIA form contract provides for the right of the ISO to exercise a full termination of the GIA, not only the unfinished phases, in the event of incomplete build out of all phases of an interconnecting generation project. The ISO’s authority to terminate an active GIA for failure of a customer to complete all phases of a project resides in [ISO TO INSERT REFERENCE TO TARIFF/BPM/GIA ARTICLE, CHAPTER, TITLE, ETC]. The ISO has indicated a need on its part to retain some recourse in the event of that a project does not build out all phases. The interest of both the interconnected customer as well as the ISO will be evaluated in this stakeholder topic.

General Recommendation on Topics #1 - #3

Topics 1, 2 and 3 are each distinct yet have a common basis in the development reality that project sizes and timing of project phases can remain uncertain sufficiently far into the study

process as to create risk for the IC as well as the ISO with respect to study assumptions that may impact other interconnecting customers. The ISO has indicated a shift in practice for this initiative wherein they will assign specific issues to individual staff. The fact that topics 1, 2 and 3 represent two high-effort topics and one medium-effort topic indicates that a ‘divide and conquer’ approach may be the best means to prevent overburdening manpower and a topic too dense to move with any reasonable pace. Even so, the interrelationship between these three topics calls out for purposeful coordination between them – and their assigned ISO staff. IEP suggests that the ISO define a working group methodology that insures each topic’s learnings and progress are regularly communicated to the assigned staff of the other two topics as well as stakeholders. The ‘closeness’ shared by these three topics suggests a higher than average probability of unintended consequences if they are worked in isolation. IEP believes that timely communication between these three topics will further enhance the outcomes of each individual topic.

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
		3
		4
		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.* – [\[insert response here\]](#)
2. *Provide a detailed explanation of the rationale for your selection of these five topics and your rankings* – [\[insert response here\]](#)
3. *Identify which of the 12 topics initially proposed to be in scope you recommend your selected topics should replace* – [\[insert response here\]](#)