

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the 2015 Interconnection Process Enhancements (IPE) Revised Straw Proposal that was posted on May 11, 2015 and as supplemented by the presentation and discussion during the May 18, 2015 stakeholder meeting.

Submit comments to initiativeComments@caiso.com

Comments are due June 1, 2015 by 5:00pm

The Revised Straw Proposal posted on May 11, 2015 may be found at:

http://www.caiso.com/Documents/RevisedStrawProposal_InterconnectionProcessEnhancements2015.pdf

The presentation discussed during the May 18, 2015 stakeholder meeting may be found at:

http://www.caiso.com/Documents/Agenda-Presentation_InterconnectionProcessEnhancements2015.pdf

For each topic that was modified in the Revised Straw Proposal please select one of the following options to indicate your organization's overall level of support for the CAISO's proposal:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

Topic 1 – Affected Systems

IEP supports the proposal. IEP also reiterates its support for further action. IEP believes that the potential risks of delay and negative outcomes as a result of a lack of agreed upon principles and practices for addressing Affected Systems on a broader basis warrants additional effort to create more refined, if not standardized, procedures for dealing with Affected Systems across the WECC. The melding of PacifiCorp into the ISO BA suggests greater need than ever to embark on a more robust Affected Systems stakeholder process that seeks to develop a common methodology. IEP asks the ISO to consider the instant proposal as a successful, interim step in a longer process and asks the ISO to consider moving Affected Systems into its own process, independent of the on-going IPE initiative, in order to provide the focus that this issue requires.

Topic 2 – Time-In-Queue Limitations

IEP supports the proposal. IEP also restates its desire that the ISO's rulemaking and practices are certified by the ISO to not run counter to timelines and commercial restrictions in place via the LTPP. IEP understands and appreciates that the ISO is sensitive to and collaborates with other regulatory bodies on rules and timelines such as the LTPP. In as much as Topic 2 and other issues the ISO may desire to move through the initiative process may also warrant thoughtful planning in order to be complementary with procurement rules, IEP asks the ISO to consider an ongoing process with stakeholder involvement that aims to create, maintain, and inform about alignment with the realities of the procurement process.

Topic 3– Negotiation of Generator Interconnection Agreements

IEP supports the proposal.

Topic 5 - Stand-Alone Network Upgrades and Self-Build Option

Comments: None

Topic 10 - Forfeiture of Funds for Withdrawal During Downsizing Process

IEP does not support the proposal at this time and requests the ISO consider a modification to the Topic 10 proposal as follows.

The CAISO indicates in this Topic that an interconnection customer with an accepted downsizing application that withdraws from the queue before the downsizing study is complete may reduce the amount they would forfeit as a result of withdrawing from the queue. The ISO explains this is possible because existing tariff language can be interpreted to mean that the downsizing customer's

Interconnection Financial Security (IFS) at risk upon withdrawal is based on the downsized project size (MW) rather than the project size in their GIA.

The ISO's concern with this scenario is that, as a result of the reduction in security the ISO can access due to the downsizing, non-downsizing projects that share network upgrades with the downsized/withdrawn project would get assigned a higher percentage of those upgrade costs. In an effort to support the original intent of downsizing, as explained by the ISO, the Topic 10 proposal aims to insure that non-downsizing customers are "no worse off" as a result of projects that downsize. Therefore, this proposal seeks to preserve the ISO's access to security based on a downsized project's original MW in order to protect non-downsizing customers from additional cost.

IEP supports the guiding principle of "no worse off" and, therefore, appreciates the ISO's intentions with this proposal. However, the proposal can be improved if it limits the proposal to situations wherein a non-downsizing customer has shared network upgrades with a downsizing customer and when the withdrawal of the downsized project has quantifiable cost impacts to the non-downsizing customer. In short, if as a result of downsizing no incremental cost would be assigned to the non-downsizing customer or customers (or if costs were to decline as a result of the downsizing), then IEP believes that the ISO should reduce the IFS at risk so that the IFS is aligned to the new MWs of the downsized project.

Topic 11 –TP Deliverability Option B Clarifications

IEP supports the proposal