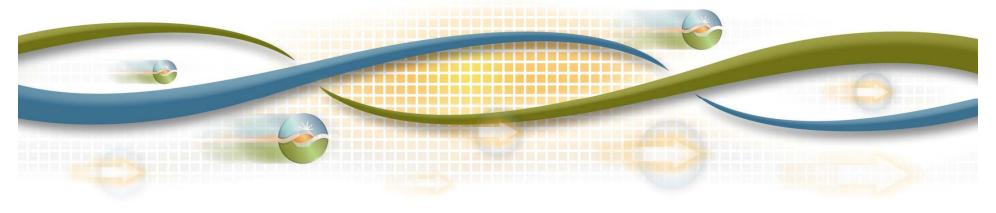


Integration of Transmission Planning and Generator Interconnection

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Background

- Today TPP & GIP operate in parallel, independently identifying and approving potentially costly, ratepayer funded transmission additions & upgrades
 - 2010 TPP revision provided some limited capability for TPP review and modification of GIP-driven projects
- 2. Current GIP rules require ratepayers to reimburse interconnection customers 100% for costs of network upgrades needed for reliability and RA deliverability
 - Other ISOs & RTOs have provisions for interconnection customers to pay for interconnection-related upgrades
 - In 2006 CAISO proposed "economic test" to limit ratepayer responsibility for high-cost upgrades; FERC rejected proposal "without prejudice"



Objectives

- Develop ratepayer-funded transmission for the ISO grid in a comprehensive planning process
- 2. Rely primarily on the TPP for developing ratepayer-funded transmission, including policy-driven needs to meet 33% RPS
- 3. Provide incentives for developers to locate projects to make the most efficient use of transmission
- 4. Limit ratepayer exposure to costs of underutilized transmission upgrades
- 5. Provide greater certainty that transmission approved by ISO will be permitted by siting authority (CPUC)
- 6. Greater transparency regarding network upgrade decisions
- 7. Resolve four open GIP issues related to initiative scope



Central Design Concepts

- 1. Identify public-policy objectives for planning in the TPP (i.e., 33% renewable energy by 2020)
- TPP determines needed policy-driven transmission to deliver energy from alternative renewable portfolios
- 3. TPP-approved transmission that meets interconnection needs will relieve ICs of GIP upgrade costs
- 4. ICs will pay for incremental upgrades beyond the TPP
 - ICs receive CRRs for transmission capacity they pay for
- 5. ISO applies an equitable process to allocate ratepayer-funded transmission in over-subscribed areas
- 6. IC is eligible to recover costs for excess capacity paid for and used by later-queued projects

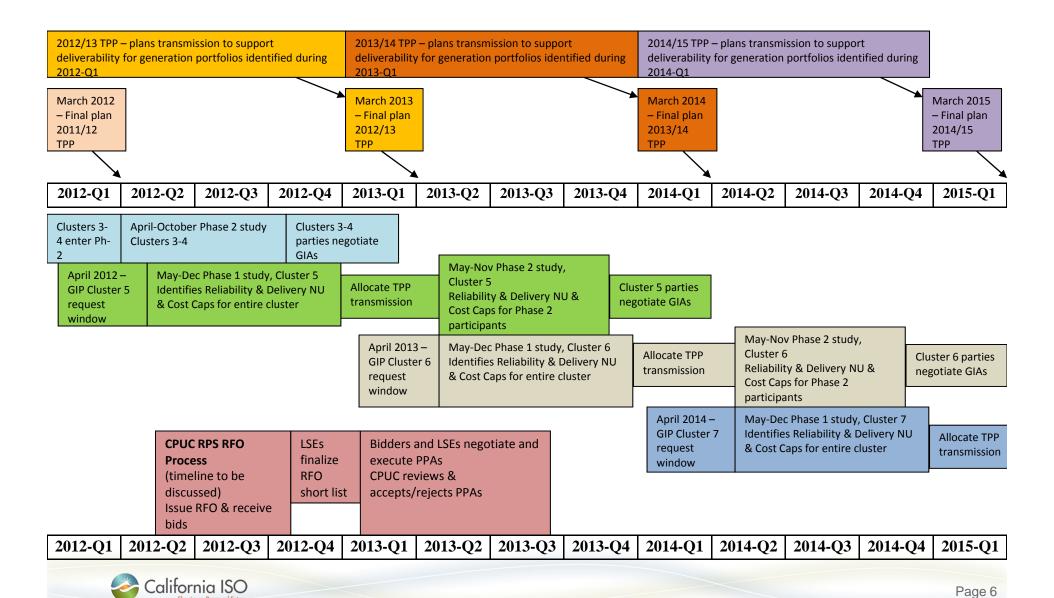


TPP-GIP Discussion Paper 11/23/2011

- New proposed time line allocation would occur between GIP Phase I and Phase II studies
- Outlines four potential mechanisms to allocate deliverability from TPP identified transmission capacity
- Allocation options include
 - LSE Choice
 - Ranking Based on Milestones and Characteristics
 - Auction
 - Pro Rata



Proposed Time Line



TPP-GIP Working Group

- Convened to enable collaborative problem solving in small groups
- CPUC presented on RPS procurement
- Five groups, each discussed
 - TPP-GIP alignment with CPUC procurement
 - Four methods to allocate deliverability from TPP identified network upgrades
 - Queue Management



Issues Raised by Most Groups

- The ISO and CPUC must coordinate schedules/planning activities better
- Queue management is very important
 - TPP-GIP initiative should not focus only on Cluster 5 and beyond; existing queue must be addressed
- No group took any of the allocation options off the table.
 - Though some were clearly preferred over others
- PPAs and firm milestones must play role in the allocation decision
- How will the new TPP-GIP address interconnection for "integration resources"?



Open Issues for the ISO

- Allocating deliverability from TPP identified transmission
 - Within a cluster
 - Allocation mechanism
 - Between clusters
 - Should TPP identified deliverability be allocated to cluster 5 projects only, even though pre-cluster 5 projects are available
 - Will TPP identified deliverability already be fully subscribed by pre cluster 5 projects (i.e. no deliverability available for cluster 5 projects)

