| ***NUM*** | ***Company*** | ***Related Tariff Section*** | ***Date of Comments*** | ***Comments*** | ***CAISO Response to Comments*** |
| --- | --- | --- | --- | --- | --- |
|  | *SDG&E* |  | *October 7, 2010* | *After much diligent effort over the past nine months by the CAISO and the stakeholders to identify needed modifications to the Small and Large Generator Interconnection Procedures, SDG&E is perplexed as to why only one week was given to review the tariff language, the final product in words that represents the changes to the generation interconnection procedures that the PTOs are to implement.* *Because the CAISO Draft Tariff Language proposes procedural changes that are brand new/not contemplated or introduced during the stakeholder process over past nine months, or that need clarification, SDG&E would recommend the CAISO should schedule a one-day turn-page review meeting with the three PTOs. The purpose of the meeting would not be for “word-smithing” the Draft Tariffs, but would allow the CAISO to explain and clarify some of the tariff language that represents a departure from the CASIO proposal approved by the CAISO Board in September.**CAISO has completely overhauled the procedures for the study processes as far as the distinction between Large and Small is concerned but any needed revision to the proforma Agreements have not been addressed yet. Should now there be just one* ***GIA****?*  | *The CAISO will consider conducting a page turn with the PTOs.**This draft of the tariff contains only one interconnection agreement. However, on further consideration, the CAISO believes that it may be appropriate to have separate LGIAs for the small generator projects and the Fast Track projects.*  |
|  | *SDG&E* | *1.2.2* | *October 7, 2010* | ***Section 1.2.2: Special Definition for the GIP****SDG&E proposes the modification to the fourth paragraph as:**“Fast Track Process” shall mean the procedure for evaluating an Interconnection Request for a certified ~~Small~~ Generating Facility no larger than 5 MW that includes the GIP Section 5.3 screens, customer options meeting, and optional supplemental review.* | *CAISO believes it is important to retain the distinction of small and large in order to highlight where tariff has particular provision unique to small generators.*  |
|  | *PGE* | *2.2.10* | *October 6, 2010* | *PG&E has concerns with the implications with respect to timing and ability to meet customer expectations of the proposed changes to the Fast Track process which would eliminate the tenth screen.**Section 2.2.10 of the SGIP, the tenth screen in the Fast Track process, states “No construction of facilities by the PTO on its own system shall be required.” As PG&E noted in previous comments, this screen should not be eliminated. The need for new transmission facilities could make it difficult to accelerate the overall schedule even in the simplest of interconnections.* | *Elimination of the 10th Screen has been discussed for several months in the stakeholder process.* |
|  | *SDG&E* | *2.3* | *October 7, 2010* | ***Section 2.3: Interconnection Base Case Data****Interconnection Base Case Data shall ~~not~~ include information subject to the confidentiality provisions in GIP Section 13.1**Although the draft tariff requires not including the projects’ confidential information but following this direction means no dynamic data will be provided.**The Dynamic Base Case Data includes information that is confidential, such as a generator’s parameters related to the technology which is included in the dynamic data file. The ISO required SDG&E to sign NDA in order to exchange base case data. SDG&E is also required to upload Base Case Data to the ISO’s non-public secure web-site.**The discussion under 2.3 about what projects will be included seams too wordy. Could that be simplified by referring to the queue and the study process time line which identifies which projects will be included?* | *SDG&E proposes including confidential information in the Base Case, presumedly other than Interconnection Customer names. The CAISO is willing to consider this change unless other stakeholders disagree..*  |
|  | *SDG&E* | *2.4.3* | *October 7, 2010* | ***Section 2.4.3: The Interconnection Studies****The Phase I and Phase II Interconnection Studies for Queue Cluster Generating Facilities will also identify Delivery Network Upgrades for all projects, including those going through the ISP, to allow the full output of a Generating Facility selecting Full Capacity Deliverability Status, and, as applicable, the maximum allowed output of the interconnecting Generating Facility without one or more Delivery Network Upgrades in accordance with the On-Peak Deliverability Assessment and Off-Peak Deliverability Assessment set forth in GIP Section 6.5.2.* | *CAISO is willing to make an equivalent change by including the following language* *“The Phase I and Phase II Interconnection Studies for Queue Cluster Generating Facilities will also identify Delivery Network Upgrades* ***for all Generating Facilities, including those being processed under the Independent Study Process****, to allow the full output of a Generating Facility selecting Full Capacity Deliverability Status, and, as applicable.”* |
|  | *SDG&E* | *3.1* | *October 7, 2010* | ***Section 3.1: General****If the Interconnection Customer has submitted multiple Interconnection Requests for the same site, then within (10) Business Days after the Scoping Meeting, the Interconnection Customer must chose and identify in writing to the CAISO a single Interconnection Request for that site to continue in the interconnection process and all other requests submitted for that same site will be deemed withdrawn.**The IC choice must be documented.* *Also Section 3.1 should be sub-divided into two sections. Section 3.1.1 will be the section as written with the above changes. Section 3.1.2 should address interconnections to jointly-owned facilities.**The new Section 3.1.2 CAISO should address interconnection to "Jointly Owned" facilities such as SWPL, where the other two participants are in a Balancing Authority other than CAISO.* | *The CAISO will remove the proposed sentence beginning “[I]f the Interconnection Customer has submitted….”**The CAISO believes that treatment of “jointly owned” facilities should be addressed in the follow-on tariff initiative effort in Dec 2010 or Jan 2011.* |
|  | *CalWEA LSA* | *3.1* | *October 6, 2010* | ***Section 3.1 – General*** * ***Proposed language***

*If the Interconnection Customer has submitted multiple Interconnection Requests for the same site, then within (10) Business Days after the Scoping Meeting, the Interconnection Customer must chose a single Interconnection Request for that site to continue in the interconnection process and all other requests will be deemed withdrawn.** ***Comments/questions***
* ***Default position:*** *What happens if the Interconnection Customer (IC) submits multiple duplicative/overlapping Interconnection Requests (IRs) for the same site but does not notify the CAISO of its choice by this deadline?*
* ***Allowed multiple requests, if any:*** *The CAISO should clarify the rules around multiple submission and evaluation of IRs for the same site, and the conditions under which more than one can be evaluated through the applicable study processes. For example:*
* *Can the IC submit Interconnection Requests (IRs) for the same site to the CAISO (with a CAISO grid interconnection point, under the CAISO tariff) and the Distribution Provider (with a distribution interconnection point, under the WDAT), and have each studied through the applicable two different processes?*
* *Can the IC submit two IRs into the CAISO queue for two projects on the same site whose COD is significantly different, e.g., more than 3 years apart, and have both studied there?*
 | *The CAISO has determined to remove the proposed language.* |
|  | *CalWEA LSA* | *3.3.1* | *October 6, 2010* | ***Section 3.3.1 – Timing for Submitting Interconnection Requests in Queue Cluster**** ***Proposed language***

*Except for Interconnection Customers requesting processing under the Independent Study Process or Fast Track Process, Interconnection Requests must be submitted during a Queue Cluster Application Window. There will be two Cluster Application Windows associated with each Interconnection Study Cycle. The first Cluster Application Window will open on October 15 and close on November 15 of the year prior to the year in which the Interconnection Studies are performed. The second Cluster Application Window will open on March 1 and close on March 31. In the event that any date set forth in this section is not a Business Day, then the applicable date shall be the next Business Day thereafter.**For the CAISO’s fourth Queue Cluster, there will only be one Cluster Application Window, which will open on March 1, 2011 and close on March 31, 2011.** ***Comments/questions:*** *Consistent with prior comments, CalWEA and LSA support two one-month Queue Cluster Application Windows per year. However, it is not clear why the proposed windows aren’t separated by 6 months, i.e., if one window is March 1st-31st, why isn’t the second September 1st-30th? Is this related to study timing? Please clarify.*
 | *The timing of the second window was chosen to fit the windows into the timing for other engineering studies and work to be performed.*  |
|  | *SDG&E* | *3.3.1* | *October 7, 2010* | ***3.3.1 Timing for Submitting Interconnection Requests in Queue Cluster****During the stakeholder process, the discussion was that there would be one (1) Cluster Application Window annually. Why now is the CAISO referring to two (2) cluster windows? Does no study activity (other than maybe IR review and Scoping Meetings) occur between the two Cluster Application Windows? Why is this second window necessary?**This seems to add unnecessary additional administrative burden and a six-month dead period for the IRs submitted in the first of the two Cluster Application Windows.*  | *The second window and the reason it was added to the proposal is discussed in Section 4.2.3 of the Final Proposal.(at p 21).* |
|  | *CalWEA LSA* | *3.5.1*  | *October 6, 2010* | ***Section 3.5.1(i) – Initiating An Interconnection Request**** ***Proposed language***

*An Interconnection Study Deposit equal to $50,000 plus $1,000 per MW of electrical output of the Generating Facility, up to a maximum of $250,000. With respect to Interconnection Customers that have submitted Interconnection Requests but do not qualify for the Serial Study Group as described in Appendix 8: (1) if such customers have posted an Interconnection Study Deposit that is less than the amount required by this section, such Generating Facilities must post the difference between the amount posted and the amount required by this section within thirty (30) Business Days of a FERC order accepting this provision; (2) if such customers have posted an Interconnection Study Deposit that is greater than the amount required by this section, such customers will receive a refund equal to the difference between the amount originally posted and the amount required under this section within thirty (30) days of a FERC order accepting this provision.** ***Comments/questions***
* ***Terminology:*** *The use of certain terminology to refer to current SGIP queue projects and their transition to the new framework that is identical to the earlier LGIP reform terminology (i.e., “Serial Group” and “Transition Cluster”) is very confusing, and inconsistent with the CAISO’s own definition in proposed GIP Appendix 8 (see below). Consistent with the GIP Appendix 8 definitions, the CAISO should use “SGIP Serial Group” here instead of “Serial Group;” likewise, “SGIP Transition Cluster” should be used when referring to that group, instead of “Transition Cluster.”*
* ***“Serial Group” exemptions:*** *The exemptions from this section should refer to both: (1) the (LGIP) Serial Group, as defined in CAISO Tariff Appendix Y, Attachment 2 (check); and (2) the SGIP Serial Group.*
* ***ICs not in the Serial Groups that posted more than the proposed Study Deposit:*** *We understand from the stakeholder process that the CAISO meant to apply the Study Deposit refund provision to apply to current LGIP Cluster #3 ICs. However, the proposed language appears to apply to all ICs, including all LGIP cluster projects still in the study process, e.g., LGIP Cluster Projects and LGIP Cluster 1 and 2 projects. Is that the CAISO’s intent?*

***Section 3.5.1.2 – Use of Interconnection Study Deposit:*** *The LGIP references in subsections (c) and (d) should be changed to GIP.****Section 3.5.1.3 – Obligation for Study Costs*** *(proposed revision to current LGIP language)** ***Current language***

*With respect to Interconnection Customers that have the cost of the Group Study will be charged pro rata to each Interconnection Request assigned to the Group Study.** ***Comments/questions:*** *The CAISO should clarify whether “pro rata” means an equal allocation per project, per MW, or some other factor.*

***Section 3.5.1.5 – Proposed Commercial Operation Date*** *(proposed revision to current LGIP language)** ***Current language***

*The proposed Commercial Operation Date of the new Generating Facility or increase in capacity of the existing Generating Facility shall not exceed seven years from the date the Interconnection Request is received by the CAISO, unless the Interconnection Customer demonstrates, and the applicable Participating TO(s) and the CAISO agree, such agreement not to be unreasonably withheld, that engineering, permitting and construction of the new Generating Facility or increase in capacity of the existing Generating Facility will take longer than the seven year period.** ***Comments/questions:*** *Given the 8-year estimates for some LGIP Transition Cluster transmission upgrades, it’s clear that an IR could have a COD more than 7 years out (e.g., if it will be located in an area with such long-duration upgrades), for reasons other than the time needed to construct the generating plant. The CAISO should revise this language to recognize those situations, e.g., by allowing the COD to be the later of 7 years from IR submission or 3 years after expected Network Upgrade completion in the area where the plant will be located.*
 | *The CAISO agrees that use of the terms Serial Group and Transition Cluster could be confusing, and that the terms “SGIP Serial Group” and “SGIP Transition Cluster are preferred.**In an effort to clarify, the CAISO has changed the wording of the second sentence in Section 3.5.1 to state:**With respect to Interconnection Customers that have submitted Interconnection Requests (1) if such customers, for whom the Phase I Interconnection Studies have not yet commenced have posted an Interconnection Study Deposit that is less than the amount required by this section, such Interconnection Customers must post the difference between the amount posted and the amount required by this section within thirty (30) Business Days of a FERC order accepting this provision; (2) if such customers, for whom the Phase I Interconnection Studies have not yet commenced have posted an Interconnection Study Deposit that is greater than the amount required by this section, such Interconnection Customers will receive a refund equal to the difference between the amount originally posted and the amount required under this section within thirty (30) days of a FERC order accepting this provision**The study deposit changes are intended to begin with Cluster 3. The CAISO has clarified this by rewording Section 3.5.1 (i) to indicate that the provision applies to interconnection requests for which Phase I studies have not commenced.**Agreed. Changes have been made.**The tariff as written is flexible enough to cover this factual scenario.* |
|  | *PGE* | *3.5.2.2* | *October 6, 2010* | *Section 3.5.2.2 Deficiencies in Interconnection Request: There is no specified timeline for the Interconnection Customer to correct any deficiencies under the Serial, Fast Track or Independent Study processes. PG&E recommends that the same timelines noted in Section 3.5.2.2 be applied to the Serial, Fast Track, and Independent Study processes. The language in Section 3.5.2.2 allows for 10 business days after the CAISO first provides notice that the Interconnection Request is not valid or within 20 business days after the close of the applicable window, whichever is later.*  | *The initial sections of the tariff are intended to apply universally to all of the study tracks. Accordingly, the time periods for Section 3.5.2.2 are intended to apply to each track.* |
|  | *SDG&E* | *3.5.2.1* | *October 7, 2010* | ***3.5.2.1 Acknowledgment of Interconnection Request.****The CAISO shall notify the Interconnection Customer within ten (10) Business Days of receipt of the Interconnection Request, which notice shall state whether the ~~completed~~ Interconnection Request is deemed complete, valid and ready to be studied.**SDG&E inserted highlighted text.* | *The CAISO is agreeable to moving the word “complete” as SDG&E suggests.* |
|  | *SDG&E* | *3.6* | *October 7, 2010* | ***3.6 Internet Posting****The CAISO will maintain on the CAISO Website a list of all Interconnection Requests. The list will be updated on a monthly basis or ten (10) Business Days after receiving any changes to an interconnection request and identify, for each Interconnection Request: (i) the maximum summer and winter megawatt electrical output; (ii) the location**The CASIO Queue should be updated regularly and consistently. SDG&E inserts language to suggest that the Queue should updated on a monthly basis, in order to provide the most updated information to developers.*  | *The CAISO believes that including an updating schedule in the tariff is inadvisable at this time. The CAISO is in the process of introducing a new computer program (referenced as “RIMS”) that will form the basis of database information for status postings, and the CAISO will have better information on frequency of updating when that program is in service. Further, frequency of updating is best included in a BPM as it does not pertain to a rate, term or condition.* |
|  | *SDG&E* | *3.4* | *October 7, 2010* | ***3.7 Coordination With Affected Systems****SDG&E inserts the following paragraph at the end of the section:**If the Interconnection Request requires Network Upgrades on the Affected System the CAISO will ensure such provisions for such upgrades are contained and accounted for in the terms and conditions of the Generator Interconnection Agreement.* *SDG&E inserted highlighted text.* | *Affected System-CAISO interaction was not part of the stakeholder process and it is not clear whether it is preferable to place the suggested requirement into the LGIA. Moreover, CAISO does not have control over what other balancing authorities do, and they may be unwilling to execute the CAISO pro form interconnection agreement.* |
|  | *SDG&E* | *4.1* | *October 7, 2010* | ***4.1 Criteria for Independent Study Process Eligibility*** *4.1.1**(ii) The Interconnection Customer is able to provide, or has demonstrated the ability to obtain, a purchase order for generating equipment specific to the proposed Generating Facility, or a statement signed by an officer or authorized agent of the Interconnection Customer demonstrating that the ~~Generating Facility~~ Developer has a commitment for the supply of its major generating equipment in time to meet the Commercial Operation Date through a purchase agreement to which the Interconnection Customer is a party;* ***4.1.4*** *The CAISO will inform an Interconnection Customer whether it has satisfied the requirements set forth in Sections 4.1.1 and 4.1.2 of the GIP within ~~ten (10)~~ fifteen (15) Business Days of receiving the Interconnection Request.****4.1.5*** *The CAISO will inform an Interconnection Customer whether it has satisfied the requirement that it be electrically independent of other Interconnection Requests, pursuant to Section 4.2 of the GIP, within fifteen (15) Business Days of receiving the Interconnection Request.* *The ISO should inform the IC of these 4.1.1 and 4.1.2 requirements within the same amount of time as the 4.2 requirements. There is no need for this amount of time to be different and no need for the CAISO to provide two notifications. There should be one IR notification to the IC, not two**4.1.6 At the IC’s option, any Interconnection Request that does not satisfy the criteria set forth in Sections 4.1.1, 4.1.2, and 4.1.3 of the GIP the CASIO shall hold the IR and study deposit until the next open cluster window. If the IC does not elect to have the ISO hold the IR, the IR shall be deemed withdrawn, without prejudice to the Interconnection Customer submitting a request at a later date.**As discussed during the stakeholder meetings, if the IR does not satisfy the ISP criteria, the IC should be allowed to opt to have the CAISO hold onto the IR until the next open Cluster Application Window.****4.2.1 Flow Impact Test*** *The CAISO, in coordination with the applicable Participating TO(s), will perform the flow impact test for each Interconnection Request requesting to be processed under the Independent Study Process as follows:* | *The CAISO agrees that the reference to Generating Facility should be a reference to the customer. However, the correct terminology to use is “Interconnection Customer” and the CAISO will make that change.**The CAISO is willing to change the time frame from 10 to 15 Business Days, so that the time for action in Sections 4.14 and 4.15 are equivalent.**The CAISO does not see a reason to place this in the tariff. It may be possible to make this arrangement without the need for the provision in the tariff.**The CAISO agrees that these words are needed.* |
|  | *PGE* | *4.2.1* | *October 6, 2010* | *Section 4.2.1 Flow impact test: In subsection (ii) there is a typographical error. The parenthetical numerical expression of “five percent” should either read “(0.05)” or “(5%)”.* | *The reference has been corrected to (5%).* |
|  | *SDG&E* | *4.3* | *October 7, 2010* | ***4.3 Scoping Meeting****Within five (5) Business Days after the CAISO notifies the Interconnection Customer if ~~it~~ the Generating Facility associated with its Interconnection Request has satisfied the independence test set forth in GIP Section 4.2, the CAISO shall establish a date agreeable to the Interconnection Customer and the applicable Participating TO(s) for the Scoping Meeting. With input from the Participating TO the CAISO shall evaluate whether the Interconnection Request is at or near the boundary of an affected Participating TO(s) service territory or of any other Affected System(s) so as to potentially affect such third parties, and, if such is the case, the CAISO shall invite the affected Participating TO(s) and/or Affected System Operator(s), in accordance with GIP Section 3.7, to the Scoping Meeting by informing such third parties, as soon as practicable, of the time and place of the scheduled Scoping Meeting.**SDG&E inserted highlighted text.* | *Replacement of it with “if” corrects a typographical error. The CAISO has no objection to adding the phrase “with the input from the PTO.”*  |
|  | *SDG&E* | *4.4* | *October 7, 2010* | ***4.4 System Impact Study******4.4.5*** *If requested by the Interconnection Customer, a Results Meeting shall be held among the CAISO, the applicable Participating TO(s), and the Interconnection Customer to discuss the results of the system impact study report, including assigned cost responsibility. The CAISO shall prepare minutes from the meeting. Any such Results Meeting will be held within 20 Business Days of the date the system impact study report is provided to the Interconnection Customer.**SDG&E inserted highlighted text.* | *The CAISO is agreeable to the change.* |
|  | *SDG&E* | *4.5* | *October 7, 2010* | ***4.5 Facilities Study******4.5.4*** *If requested by the Interconnection Customer, a Results Meeting shall be held among the CAISO, the applicable Participating TO(s), and the Interconnection Customer to discuss the results of the facilities study report, including assigned cost responsibility. The CAISO shall prepare minutes from the meeting, Any such Results Meeting will be held within 20 Business Days of the date the facilities study report is provided to the Interconnection Customer.**SDG&E inserted highlighted text.* | *The CAISO is agreeable to the change.* |
|  | *PGE* | *4.5.4* | *October 6, 2010* | *Section 4.5.4: PG&E suggests that Interconnection Customers must make their request for a Results Meeting within 10 Business Days of the receipt of the facilities study report. Any such Results Meeting will be held within 20 Business Days of the date of the facilities study report is provided to the Interconnection Customer.* | *The CAISO has changed the provision to state that the customer must request a Results Meeting within 10 Business Days of the date of the report. The 10 and 20 day time frames are from date of report, not receipt, as receipt is this date is easily determined.* |
|  | *CalWEA* | *Section 4 and 5* | *October 6, 2010* | ***Failure of a project submitted into the Independent Study Process (ISP) or Fast-Track Process (FTP) to qualify under that submittal**** ***Proposed language***

***Section 4.1.6 (ISP):*** *Any Interconnection Request that does not satisfy the criteria set forth in Sections 4.1.1, 4.1.2, and 4.1.3 of the GIP shall be deemed withdrawn, without prejudice to the Interconnection Customer submitting a request at a later date.****Section 5.5.2.4.1.4 (FTP):*** *If not, the Interconnection Request will be deemed withdrawn, without prejudice to the Interconnection Customer resubmitting its Interconnection Request for processing in either a Queue Cluster or under the Independent Study Process.** ***Comments/questions:*** *Depending on the timing of the ISP/FTP project submission and the CAISO/PTO finding that the project does not qualify for the ISP/FTP, the project may have to wait many months for the next application window. However, the project may still otherwise be ready to proceed quickly, depending on the reason for the qualification failure.*

*While this situation may not be avoidable, the CAISO should include a provision allowing such projects to be included in a cluster where the application window has already closed, if: (1) the ISP/FTP application was otherwise valid; and (2) the project can be included in the Phase I Studies for that cluster without delaying the performance of those studies.* | *The CAISO is concerned that the standard “can be including without delaying the performance of the Phase 1 studies” would be too vague a standard for inclusion in the tariff.* |
|  | *CalWEA LSA* | *Section 4* | *October 6, 2010* | ***Section 4.2.1 – Flow Impact Test**** ***Proposed language***

*The CAISO, in coordination with the applicable Participating TO(s), will perform the flow impact test for each Interconnection Request requesting processed under the Independent Study Process as follows:*1. *Identify the transmission facility closest, in terms of electrical distance, to the proposed Point of Interconnection of the Generating Facility being tested that will be electrically impacted, either as a result of Network Upgrades identified or reasonably expected to be needed by Generating Facilities currently being studied in a Queue Cluster, or as a result of Network Upgrades identified or reasonably expected to be needed by earlier queued Generating Facilities currently being studied through the Independent Study Process. If the current Queue Cluster studies or earlier queued Independent Study Process studies have not yet determined which transmission facilities require network upgrades, the Generation Facility being tested must wait for such determination prior to the CAISO conducting the independence analysis.*
2. *The incremental power flow on the transmission facility identified in 4.2.1(i) that is caused by the Generating Facility being tested will be divided by the lesser of the Generating Facility’s size or the transmission facility capacity. If the result is five percent (0.05%) or less, the Generating Facility shall pass the flow impact test. This test shall be conducted assuming normal system conditions with no contingencies.*
3. *If the Generating Facility being tested under the flow impact test is reasonably expected to impact transmission facilities identified per section 4.2.1 (i) when testing one or more earlier queued Generating Facilities currently being studied through the Independent Study Process, than an additional aggregate power flow test shall be performed. The aggregate power flow test shall require that the aggregated power flow of the Generating Facility being tested plus the flow of all earlier queued Generating Facilities currently being studied under the Independent Study Process that impact transmission facilities identified per Section 4.2.1(i) be (5) percent or less of the transmission facility’s capacity to pass the flow test. Likewise, if the aggregate power flow on any transmission facility identified per Section 4.2.1 (i) is greater than five (5) percent of the transmission facility capacity but the incremental power flow as a result of the Generating Facility being tested is one (1) percent or less than of the transmission facility’s capacity, the Generating Facility shall pass the test. These tests shall be applied assuming normal system conditions with no contingencies. The Generating Facility being tested must pass both this aggregate test as well as the individual flow test in 4.2.1 (ii), in no particular order.*
* ***Comments/questions***
* ***Typo:*** *The parenthetical value in subsection (ii) should be corrected, presumably to 5%.*
* ***General comment:*** *In addition to a few typos, we find this procedure and language to be somewhat confusing – an example would be very helpful in clarifying the CAISO’s intent. Furthermore, as CalWEA has noted before, regardless of the good CAISO and PTO intentions, the electrical independent test is arbitrary and will likely become subject of many arguments*
 | *The typo has been corrected to 5%.**The CAISO will consider including an example in the Transmittal Letter or supporting testimony.*  |
|  | *CalWEA LSA* | *4.2.2* | *October 6, 2010* | ***Section 4.2.2 – Short Circuit Test**** ***Proposed language***

*If the short circuit contribution from the Generating Facility (existing or proposed) being tested at the transmission facility identified in GIP Section 4.2.1(i) is less than 100 amperes, the Generating Facility shall pass the short circuit test.** ***Questions/comments***
* *The short circuit test is unnecessary, because any upgrade overlap as a result of this test will likely be trivial.*

*If the test is nevertheless retained, it should be modified to recognize short-circuit software limits. For example, SCE has indicated that its short-circuit software only has a resolution of 100 amps; thus, assuming normal rounding, it cannot distinguish between 51-amp and 100-amp contributions. If so, the criteria requires more precision than the modeling tool can support, and we recommend changing the threshold to 150 amps. Above that threshold, the CAISO could also consider using a percentage-based variable, rather than a fixed value.* | *The comment reaches back to the working group discussions regarding development of the test.* |
|  | *SDG&E* | *4.6* | *October 7, 2010* | *In last sentence, change as follows: “If the Generating Facility achieves its Commercial Operation Date before the Deliverability Assessment is completed and any necessary Delivery Network Upgrades are in service, the proposed Generating Facility will be treated as an Energy-Only Deliverability Status ~~proposed~~ Generating Facility until such Delivery Network upgrades are in service* | *The CAISO is agreeable to deleting “proposed.”* |
|  | *SDG&E* | *5* | *October 7, 2010* | *Section 5 addresses the Fast Track that only applies to projects up to 5 MW, so the size is defined. The “Small Generating Facility ” should be changed to “Generating Facility ” from the verbiage under 5.4, 5.5.1, and 5.5.1.3*  | *The CAISO does not believe the change is necessary.* |
|  | *PGE* | *5* | *October 6, 2010* | 1. *Under the Fast Track process, the PTOs are expected to tender an Interconnection Agreement to the Interconnection Customer within 5 business days of either passing of the screens or a CAISO/PTO determination under Sections 5.3.2 and 5.3.3. This timeline is highly optimistic and is not realistic. PG&E recommends 30 Calendar Days to be consistent with the IA timelines for the Facilities and Cluster Studies.*
2. *PG&E believes that 15 business days for Initial Review and 10 business days for Supplemental Review is not sufficient under Section 5.2 and 5.5.1 of the Fast Track process. With the proposed change to increase the cap of the Fast Track to 5MW, PG&E believes that more rigor is necessary to perform the Initial Review and Supplemental Review and thus more time should be allotted. PG&E recommends 30 Business Days for the Initial Review and 30 Business Days for the Supplemental Review. With the elimination of the tenth screen and the increase to 5 MW for the Fast Track process, the number of projects that qualify for Fast Track will greatly increase and impact the PTOs’ ability to complete the reviews in a timely manner.*
 | *The time frames for Sections 5.3.2 and 5.3.3 have been extended from 5 to 15 business days.**PG&E’s comment that the time frames are to short may have merit.* |
|  | *SDG&E* | *5.4* | *October 7, 2010* | ***5.4 Customer Options Meeting****If the CAISO and Participating TO determine~~s~~ the Interconnection Request cannot be approved without modifications at minimal cost; or a supplemental study or other additional studies or actions; or at…**Corrected typo error.* | *The CAISO appreciates the correction of the typographical error.* |
|  | *SDG&E* | *5.5* | *October 7, 2010* | ***5.5 Supplemental Review******5.5.1.1*** *If so, then, within ~~five (5)~~ fifteen (15) Business Days of such a determination, the Participating TO shall forward an* ***Generator Interconnection Agreement (GIA)*** *to the Interconnection Customer for execution.****5.5.1.2*** *If so, and Interconnection Customer facility modifications are required to allow the Generating Facility to be interconnected consistent with safety, reliability, and power quality standards, the Participating TO shall forward an*  ***Generator Interconnection Agreement (GIA)*** *for execution to the Interconnection Customer within  ~~five (5)~~ fifteen (15) Business Days after confirmation that the Interconnection Customer has agreed to pay for the identified modifications to the Participating TO’s electric system.****5.5.1.3*** *If so, and modifications to the Participating TO's electric system are required to allow the Small Generating Facility to be interconnected consistent with safety, reliability, and power quality standards, the Participating TO shall forward an*  ***Generator Interconnection Agreement (GIA)****for execution to the Interconnection Customer within ~~ten (10)~~ fifteen (15) Business Days that requires the Interconnection Customer to pay the costs of such system modifications prior to interconnection.**Five (5) Business Days or ten (10) Business Days is not sufficient. It does not provide enough time to prepare and forward a Generation Interconnection Agreement to the IC, especially if the CASIO intends to use the same detailed agreement document as is used for the GIP and ISP for the Fast Track projects. SDG&E proposes fifteen (15) Business Days.* *Also, it is not clear if the CAISO intends to use the same pro-forma GIA for Fast Track projects as used for GIP and ISP projects. This should be clarified and the same “GIA” acronym used.* | *The CAISO has incorporated the changes to time frame from 5 to 15 Business Days.* *The CAISO also believes that it may be desirable to have a separate, shorter Interconnection Agreement for the Fast Track.* |
|  | *SDG&E* | *6.1* | *October 7, 2010* | ***6.1 Generator Interconnection Study Process Agreement****Within thirty (30) calendar days of the close of the (?) Cluster Application Window, the CAISO shall provide to each Interconnection Customer with a valid Interconnection Request received during the Cluster Application Window a pro forma Generator Interconnection Study Process Agreement in the form set forth in Appendix 3 of this GIP.* *Section 3.3.1 indicates there are two (2) Cluster Application Windows - so the word “the” is incorrect – which Cluster Application Window is being referred to here?* | *The CAISO has replaced the word “the” with the word “a.”* |
|  | *PGE* | *6.2* | *October 6, 2010* | *Section 6.2 Scoping Meeting: PG&E requests the option to move directly to drafting the Interconnection Agreement. There may be interconnection requests that have no material modification and thus no need to conduct the Study Process nor the Fast Track Process for example renegotiations of Interconnection Agreements and QF conversions.**In addition, there is a typographical error in the fourth paragraph. The sentence should read “...provide the Interconnection Customer and the other attendees an opportunity to...”* | *Under CAISO Tariff Section 25, (Section 25.1.2.1) a converting Qualifying Facility that confirms that its total capacity and electrical characteristics are substantially unchanged will not be placed in the interconnection queue. Under current processes, no study is needed and the project moves directly to Interconnection Agreement.**The typo has been corrected (changing “and [sic] opportunity” to “an opportunity.”)* |
|  | *CalWEA LSA* | *6.2* | *October 6, 2010* | ***Section 6.2 – Scoping Meeting**** ***Proposed language*** *(edits below show proposed revisions to current LGIP)*

*The CAISO shall prepare minutes from the meeting, and provide the Interconnection Customer and the other attendees and opportunity to confirm the accuracy thereof, that will include, at a minimum, discussions among the applicable Participating TO(s) and the CAISO of the expected results and a good faith estimate of the costs for the Phase I Interconnection Study.** ***Comments/questions***
* ***Grammar:*** *Change “and” to “an” in second row above.*
* ***Relationship to current initiative:*** *The proposed changes do not seem to be related to or required by the SGIP reforms. However, we support the formal requirement to memorialize the meeting discussion.*
* ***Substance of the change:*** *These revisions seek to change the meaning of this provision from requiring concurrence by the IC to simply giving the IC the opportunity to comment. At the very least, the final minutes should reflect any disagreements by the IC with the CAISO’s account of the meeting.*
 | *The grammatical error has been corrected.**The revision is not intended to alter the meaning of the language. Agreed that any disagreements between parties should be reflected in the minutes.* |
|  | *SDG&E* | *6.2* | *October 7, 2010* | ***6.2 Scoping Meeting****Within five (5) Business Days after the CAISO notifies the Interconnection Customer of a ~~completed~~ Interconnection Request that is complete, valid and ready for study, the CAISO shall establish a date agreeable to the Interconnection Customer and the applicable Participating TO(s) for the Scoping Meeting. All Scoping Meetings shall occur no later than sixty (60) calendar days after the close of the (?) Cluster Application Window, unless otherwise mutually agreed upon by the Parties.**SDG&E inserted highlighted text.**Also, if there are two (2) Application Cluster Windows, - so the word “the” is incorrect –which one is this referring to here?* | *The CAISO has made the change deleting “completed” and replacing it with the phrase “that is complete” and has changed “the” to “a” before “Cluster Application Window.”* |
|  | *SDG&E* | *6.6* | *October 7, 2010* | ***6.6 Use Of Per Unit Costs To Estimate Network Upgrade Costs****Prior to adoption and publication of final per unit costs for use in the Interconnection Study Cycle, the CAISO shall publish to the CAISO Website draft per unit costs, including non-confidential information regarding the bases therefore, to address the draft per unit costs, and permit stakeholders to provide comments on the draft per unit costs. A schedule for the release and review of per unit costs is set forth in Appendix 5 of this GIP.**[Comment:] The Stakeholder meeting is not necessary. The CAISO stakeholder meeting was not held in 2010. Posting on web and taking stakeholder comments is enough. The PTO unit cost estimates are not negotiable and will not be changed by stakeholder comments. The meeting is most likely for describing the method of calculation which can be accomplished through a conf call.*  | *The CAISO agrees that the stakeholder meeting need not be an in-person meeting, but does not believe that a tariff change is necessary.* |
|  | *CalWEA LSA* | *6.6* | *October 6, 2010* | ***Section 6.6 – Use of Per-Unit Costs to Estimate Network Upgrade Costs**** ***Proposed language***

*Each Participating TO, under the direction of the CAISO, shall publish per unit costs for facilities generally required to interconnect Generation to their respective systems.** ***Comments/questions***
* ***Annual updates:*** *Why is the requirement to update the costs being deleted?*
* ***Additional detail:*** *The language should specify that these are expected costs but should be “benchmarked” against recently incurrent PTO costs.*

***Section 6.8 – Phase I Interconnection Study Procedures*** *(revisions to current language)* * ***Affected System involvement:*** *The language should be revised to provide for Affected Systems to be brought in at the early stages of the process, e.g., for Base Case development and review/comment of the draft report.*
* ***Study issuance timing:*** *The CAISO should issue studies as they are completed – e.g., if studies for some clusters, or by some PTOs, are completed ahead of others. There is no reason to deprive ICs of the additional review time, or earlier input that can be used in development activities for the projects being studied or other projects.*
 | *Because there is now no queue cluster at the beginning of each year (i.e. in Jan of the year).**Benchmarking is a potential issue for discussion in the upcoming Dec/Jan stakeholder effort.**Early interaction with Affected Systems and participation in Base Case development is done in practice.**The CAISO followed the practice recommended here in release of Transition Cluster reports.*  |
|  | *SDG&E* | *6.8* | *October 7, 2010* | ***6.8 Phase I Interconnection Study Procedures****The CAISO shall use Reasonable Efforts to commence the Phase I Interconnection Study by June 1 of each year, and to complete and publish to Interconnection Customers the Phase I Interconnection Study report within one hundred thirty-four (134) days after the annual commencement of the Phase I Interconnection Study**[Question] If the first Cluster Application Window closes on November 15 of the prior year, then why must the IR sit idle for six (6) months before the study begins in June?* | *Answer: Because the customer has requested to be included in the cluster. During the stakeholder process, customers wanted to have a second Cluster Application Window to have the opportunity for a scoping meeting between March of each calendar year. The stakeholders who requested this second window understood that their project applications would not be studied until the June Phase I study period of the following calendar year. Also, during the 6 month period between Nov and June, the CAISO is working on components of the interconnection process.* |
|  | *SDG&E* | *6.9* | *October 7, 2010* | ***6.9 Phase I Interconnection Study Results Meeting****The CAISO shall prepare minutes from the meetings, and provide the Interconnection Customer and the other attendees an opportunity to confirm the accuracy thereof.**SDG&E inserted highlighted text.* | *The CAISO has included the requested text at the end of Section 6.9* |
|  | *SDG&E* | *7.1* | *October 7, 2010* | ***7.1 Scope Of Phase II Interconnection Study****Within five (5) Business Days following the Phase I Results Meeting, the Interconnection Customer shall submit to the CAISO the completed form of Appendix B (Data Form To Be Provided by the Interconnection Customer Prior to Commencement of the Phase II Interconnection Study) to its Generator Interconnection Study Process Agreement, and within such Appendix B, the Interconnection Customer shall either (i) confirm the desired deliverability status that the Interconnection Customer had previously designated in the completed form of Appendix A to the Generator Interconnection Study Process Agreement (Assumptions Used in Conducting the Phase I Interconnection Study); or (ii) change the status of desired deliverability from Full Capacity Deliverability Status to Energy-Only Deliverability Status.**SDG&E inserted highlighted text.* | *The words “Phase I” have been added to the sentence.* |
|  | *SDG&E* | *7.7* | *October 7, 2010* | ***7.7 Phase II Results Meeting With The CAISO And Applicable Participating TO(s)****SDG&E inserted highlighted text.* | *The words “Phase II Results” were inadvertently deleted from the Section Title and have been restored.* |
|  | *CalWEA LSA* | *8.1* | *October 6, 2010* | ***Section 8.1 – One-Time Full Capacity Deliverability Option**** ***Proposed language***

***8.1.1*** *A Large Generating Facility previously studied for deliverability as Energy-Only Deliverability Status or as Small Generating Facility under the CAISO Tariff will have a one-time option to be studied for Full Capacity Deliverability Status.****8.1.2*** *An Interconnection Customer must make such election within the Cluster Application Window for the CAISO’s fourth Queue Cluster, which will open on March 1, 2011.****8.1.3*** *Any Interconnection Customers selecting this option will be studied as part of the Phase I and Phase II Interconnection Studies for the CAISO’s fourth Queue Cluster.****8.1.4*** *Interconnection Customers electing this one-time option will be required to post a study deposit in the amount set forth in Section 3.5.1 of this GIP, less any study deposit amounts already paid if the Interconnection Customer’s Generating Facility is still in the CAISO’s interconnection queue.** ***Comments/questions***
* ***Terminology:*** *The CAISO should consider using a different term besides “deliverability” to refer to an Energy-Only project – e.g., Energy-Only “interconnection” – because that term is usually associated only with Full Capacity interconnections.*
* ***Applicability***
* ***Prior LGIP Energy-Only projects:*** *CalWEA and LSA support allowing prior LGIP Energy-Only projects to be studied for Full Capacity status under this provision.*
* ***Distribution-level projects:*** *There was extensive discussion in the stakeholder process about allowing generation projects interconnected (or interconnecting) under WDAT or other distribution-level arrangements (e.g., those in CAISO-area municipal utility territories) to:*
* *Also receive the one-time opportunity to get a Deliverability Assessment in CAISO GIP Cluster #4, like CAISO tariff SGIP and Energy-Only LGIP projects; and*
* *Do the same in the future, if they enter the interconnection process through the WDAT or other applicable arrangements and those arrangements have not been modified to match the CAISO’s proposed GIP changes.*

*However, the proposed language does not appear to apply to WDAT or other distribution-level projects at all. The CAISO should change the proposed language to include those projects, as described above.** ***Deposit requirements for this deliverability option:*** *Please clarify the deposit requirements for projects electing only a Deliverability Assessment in Cluster #4.*
* ***Projects “in the CAISO’s interconnection queue” (Section 8.1.4):***  *If a project is on-line, isn’t it still listed in the interconnection queue? What is intended here?*
 | *CAISO has removed the words “for deliverability from 8.1.1 to address the concern about reference to a current Energy-Only project.* *The CAISO believes that the discussion of CAISO interaction for WDAT projects is more appropriately placed in the WDAT tariffs and not in the CAISO’s GIP, which relates to CAISO processing of Interconnection Requests.**As to deposit amount, 8.1.4 answers the question—post study deposit set forth in Section 3.5.1 less any deposit amounts already paid.**As to question relating to Section 8.14, the tariff language uses the words “is still active in the CAISO’s interconnection queue, meaning any project that has not executed an LGIA.* |
|  | *CalWEA LSA* | *8.2.4.3* | *October 6, 2010* | ***Section 8.2.4.3*** * ***Proposed language***

*If the assessment of available transmission capability conducted under this GIP Section 8.2.4 indicates that there is some transmission capacity available for use by the Interconnection Customer, but less than is necessary to deliver the full output of the Interconnection Customer’s Generating Facility, then the Interconnection Customer’s Generating Facility will be considered to be partially deliverable, and the amount of transmission capability made available to that Interconnection Customer’s Generating Facility will be equal to the determination of available capacity for the Generating Facility rounded down to the nearest 50 MW increment.** ***Comments/questions***
* *There is no apparent reason why larger projects cannot get less than 50 MW of partial deliverability. For example, a considerable amount of value might be added to a 50 MW project by a 40 MW deliverability designation. The CAISO’s recent Technical Bulletin seems to allow generation projects to get partial deliverability through the interconnection process without any minimum increment, and there does not appear to be a reason why a minimum increment would apply here.*

*If it is necessary to establish a lower limit, that limit could consider the magnitude of the “transfer capability” of the limiting transmission component, e.g., the line or corridor. This approach would set the minimum increment at the lower of (1) 50 MW; or (2) some percentage of the transfer capability of the limiting transmission element, e.g., 5-10%.** *Language should be added to implement Section 4.4.2.(5) of the Draft Final Proposal, which provided that conceptual transmission congestion mitigation plans would be identified for generation assessed in the annual deliverability study that were denied Full Capacity, and would be considered in the ISO comprehensive transmission planning process.*
* *Generally speaking, the ability of FC projects to get partial deliverability through the interconnection process before all Deliverability Network Upgrades are complete should be clarified in this tariff filing.*
 | *This comment reiterates the stakeholder’s preferred approach in the stakeholder process. The statement that ”there is no apparent reason” for the approach is not factually correct. The reason the approach was taken is because of system benefit –the system receives greater benefit if MW increments provided to projects are at least 50 MW in size.**Other comments indicating thatCAISO should undertake a greater consideration of allocation principles indicate that there may be need to flesh out the subject in the next stakeholder round of the review to the interconnection process*  |
|  | *CalWEA LSA* | *9.2* | *October 6, 2010* | ***Section 9.2**** ***Proposed language*** *(revised LGIP)****:*** *The proposed language accurately reflects the $15 million Second IFS Posting cap in the Draft Final Proposal.*
* ***Comments/questions:*** *We assume that, if FERC approves this CAISO proposal, it would apply to all Second IFS Postings, including those due from the Transition Cluster in early 2011. Please confirm that interpretation.*
* ***Applicability to current LGIP cluster-study projects:*** *Please clarify here that, if FERC approves this CAISO proposal, it would apply to all Second IFS Postings, including those due from the Transition Cluster in early 2011.*
* ***ISP IFS posting timing:*** *The proposed language shows the Initial IFS Posting due only 30 CDs after the SIS results are provided. As the Results Meeting may not happen until 20 BDs after the study release, that initial posting may be due almost concurrently. The Results Meeting should occur at least 14 CDs before this IFS posting is due, to allow for the sufficient IC consideration of the information from the meeting.*
 | *The CAISO also desires that the $15 million cap to the Second Financial Security Instrument posting would apply to the current Transition Cluster and would ask for this application in its filing.**The timing for posting the initial Financial Security Instrument for the Independent Study Process track will be changed from 30 calendar days to 60 calendar days.* |
|  | *SDG&E* | *9.2* | *October 7, 2010* | ***9.2 Initial Posting Of Interconnection Financial Security****First, each Interconnection Customer for a ~~Small~~ Generating Facility assigned to a Queue Cluster or ~~Small~~ Generator Interconnection Customers in the Independent Study Process shall post an Interconnection Financial Security instrument in an amount equal to the lesser of…**SDG&E deleted highlighted text.**Notwithstanding the foregoing, if the costs of the actual estimated Network Upgrades are less than the minimum posting amounts set forth above, the posting amount required will be equal to the actual estimated Network Upgrade amount.* *It is unclear what the term “actual estimated” means. Are they actual costs or are they estimated costs?* | *The word “Small” must be retained to distinguish posting requirements for Small Generating Facilities from those of Large Generating Facilities.**The words “actual estimated” were in error. The Section has been changed so that the references are to “estimated Network Upgrades.”* |
|  | *Wellhead Electric* | *9.2* | *October 8, 2010* | *Wellhead appreciates the effort the CAISO has put into the revisions to the Interconnection Procedures as well as the opportunity to comment on the draft tariff language. Wellhead believes there is an inconsistency in one section of the Tariff language that needs to be corrected in order to ensure the Tariff consistently encourages project sponsors to “right size” their projects.* *The section of the Tariff that needs clarification is 9.2 and relates to the security deposits that are required at the end of the Phase 1 study for projects that are continuing with Phase 2. The Tariff clearly allows/encourages projects to downsize at the end of Phase 1 in order to avoid costly upgrades by changing to the size of the proposed project. However, the language in Section 9.2 does not clearly state that the required security deposit based on the Phase 1 results will take account of the downsizing decision (although that is only interpretation that would be fully consistent with the downsizing option and “right sizing” intent already encompassed in the Tariff).**This clarification is also appropriate because until the CAISO has completed the Phase 1 study, the project sponsor does not know how many additional MWs can be interconnected without triggering upgrades. The CAISO and PTO are the only ones with the information as to when an upgrade will be triggered. Penalizing a project sponsor because it did not have access to all of the same information known to the CAISO and PTO and used in the Phase 1 study is not reasonable.**The CAISO has made a number of changes to the interconnection procedure clearly intended to encourage right sizing and has also made changes to ensure that security deposits are not unreasonable or cause projects unnecessary financial costs. Making it clear that the security deposit for continuing into Phase 2 is based on reality (rather than a set of circumstances that are known to be invalid) is the only fair and reasonable requirement and should be clearly stated in Section 9.2 of the Tariff. A project sponsor should NOT have to post security based on the cost of upgrades that it has decided to avoid.*  | *The question raised by Wellhead pertains to potential adjustment of the Large Generating Unit posting requirements. Other than the cap related to the Second Posting, the CAISO has reiterated throughout the stakeholder process that issues pertaining to adjustment of features unique to large generators are slated for the next round of interconnection stakeholder refinements, in a process to begin in either December or January.* |
|  | *CalWEA LSA* | *9.3.1 and 9.3.1* | *October 6, 2010* | ***Sections 9.3.1 & 9.3.2 – policy issue with current process:*** *The Phase II Study is issued to the IC in final form, without opportunity for revision based on IC comments, and CAISO/PTO resistance to additional study and revision. However, it is possible that additional study work might be performed pursuant to an E&P agreement, and/or the CAISO, PTO, and IC might agree to changes in the Network Upgrades or PTO Interconnection Facilities in the process of negotiating the (L)GIA.* *The tariff language should be revised to recognize these practical realities, i.e.: (1) provide that the Second IFS posting amounts for Network Upgrades would be based on the amounts in the GIA; and (2) the IFS posting amounts should be adjusted to reflect any later changes in Interconnection Facility, Distribution Upgrade, or Network Upgrade cost estimates, e.g., if other projects drop out and some of the anticipated Network Upgrades for the cluster are no longer needed.* | *These comments relate to refinements that are more appropriate for discussion in the next stakeholder round.* |
|  | *SDG&E* | *11* | *October 7, 2010* | ***Section 11 Generator Interconnection Agreement (GIA)****It is not clear whether or not this same GIA will be used for the Fast Track projects? If so, the same acronym should be used the Fast Track text and additional time should be allocated for the Fast Track GIA negotiations.*  | *The CAISO believes that it is best to use a shorter form of Interconnection Agreement for the Fast Track Process and will prepare a form for inclusion in the tariff.* |
|  | *CalWEA LSA* | *Appendix 1* | *October 6, 2010* | ***GIP Appendix 1 – Interconnection Request – Attachment A******Section 1a:*** *The requirement should provide thatallow the IC to provide the electrical data to populate the PSLF models, since not all generators have access to the PSLF software and can provide the data in the \*.epc format.****Section 11a – Collector System Equivalenced Impedance Data:*** *The data request is inconsistent – it asks for equivalenced data but refers to the data for each collector circuit. Instead, the equivalenced data should be submitted as per the draft “WECC Guide for Representation of Photovoltaic Systems In Large-Scale Load Flow Simulations” or its wind counterpart (WECC Wind Power Plant Power Flow Modeling Guidelines” dated May 2008). These documents include a data form to be completed by the IC for the equivalenced model.* |  |
|  | *CalWEA LSA* | *Appendix 4* | *October 6, 2010* | ***GIP Appendix 4 – Agreement for Allocating GIP and Study Responsibilities*** ***Attachment A – Interconnection Study Responsibility Allocation******Queue cluster study timeline:*** *Please reconcile the timeline with the 420 days for the entire GIP process mentioned in the stakeholder process and CAISO Board meeting materials.****Other study process timelines:*** *Please provide similar timelines (reconciled to the totals discussed in the stakeholder process) for the Independent Study and Fast Track Processes.* | *For the cluster study timeline the breakdown is follows:**Phase I 136 days**Phase II 196 days**Subtotal 330 days**Plus 90 days between Phase I and Phase II (provides time for customer to determine whether to continue)**Total 420 days**For ISP as written, the timeline is 90 business days for SIS with 60 business days to post plus a second 90 day for FAS timeframe.*  |
|  | *SDG&E* | *Appendix 5* | *October 7, 2010* | ***Appendix 5 Schedule for Release and Review of Per Unit Costs***

|  |  |  |
| --- | --- | --- |
| *~~15.~~* | *~~CAISO to schedule and conduct a one-day stakeholder meeting in February to discuss the posted per unit costs with stakeholders.~~* | *~~Second week of February~~* |

*The CAISO stakeholder meeting was not held in 2010. The Stakeholder meeting is not necessary. Posting unit costs on the CAISO web page and taking stakeholder comments is enough. The PTO unit cost estimates are not changed by stakeholder comments.*  | *The CAISO believes that the tariff language calling for a meeting provides the CAISO with the flexibility to conduct meetings in the form of conference calls and so that an in-person meeting is not required. The CAISO does not propose to strike this cell within the table.* |
|  | *CalWEA LSA* | *Appendix 8* | *October 6, 2010* | ***Section 1.2.2 – Special Definitions for this GIP Appendix 8**** ***Proposed language***

*In this Appendix 8 to the GIP, the following words and expressions shall have the meanings set opposite them:****"SGIP Serial Study Group"*** *shall mean those Interconnection Customers with valid Interconnection Requests submitted pursuant to Appendix S of the CAISO Tariff prior to December 15, 2010 and who have executed a System Impact Study or Facilities Study Agreement providing for the completion of such studies by December 15, 2010.****"SGIP Transition Cluster"*** *shall mean those Interconnection Customers with valid Interconnection Requests submitted pursuant to Appendix S of the CAISO Tariff prior to December 15, 2010 and which have not executed a System Impact Study or Facilities Study Agreement that provides for the completion of such studies by December 15, 2010.** ***Comments/questions***
* ***General terminology:*** *See comments above on terminology consistency – these definitions should be applied consistently throughout the new GIP document.*
* ***Serial/Transition Cluster criteria:*** *The date here for distinguishing between the SGIP Serial and Transition Cluster projects is considerably different from the July 30th date in the Draft Final Proposal. Please explain the reason for the date change.*
* ***Closing the current SGIP:*** *The Draft Final Proposal would have closed the current SGIP as of September 30th but there has been no announcement of that change, and closing the SGIP is not mentioned in the proposed language. Please:*
* ***Explain the CAISO’s intentions*** *with respect to closing the SGIP; and*
* ***Confirm that any last-minute “gold rush” of SGIP applications will not delay study due dates*** *for the SGIP Transition Cluster, any prior LGIP projects, or future GIP projects, to the extent that the SGIP is to be closed at some time in the future (e.g., on December 15th).*

***Section 2 – Queue Position**** ***Proposed language***

*The Queue Position of any Interconnection Request included in the SGIP Transition Cluster shall be deemed to be lower than that of any Interconnection Request included in the SGIP Serial Study Group for purposes of performing Interconnection Studies for Generating Facilities whose Interconnection Requests are in the SGIP Serial Study Group.** ***Comments/questions:*** *We note that the SGIP Transition Cluster is to be studied in the Phase II Studies for LGIP Clusters #1 and #2 (see concerns about that below). What is the respective “Queue Position” of the SGIP Serial Group and Transition Cluster projects with respect to those LGIP clusters?*
 | *The CAISO agrees that the terminology should be consistent.**The December date was chosen because of a concern for retroactive effect if earlier dates were chosen.* |
|  | *CalWEA LSA* | *Appendix 8* | *October 6, 2010* | ***Section 3.2 – Transition of Projects in SGIP Serial Study Group*** * ***Proposed language***

*An Interconnection Request deemed to be included in the SGIP Serial Study Group that wishes to be studied as a Full Capacity Deliverability Generating Facility will continue to be processed per the procedures set forth in Appendix S to the CAISO Tariff for Energy-Only deliverability, with a Full Capacity deliverability assessment to be performed as part of the next Interconnection Study Cycle following the completion of the serial portion of the Generating Facility’s studies pursuant to Appendix S.** ***Comments/questions***
* *How likely is it that the SGIP Serial Group study process will be completed by the July 31st, 2011 date that SGIP Transition Cluster studies are to be finished? If that likelihood is low, how would upgrades for these projects be treated in studies for the later-queued projects?*
* *If SGIP Transition Cluster projects can enter Cluster #4 to get a Deliverability Assessment, before their EO studies are complete, why can’t SGIP Serial Group Projects do the same?*
* *What is the relative Queue Position of SGIP Serial Group projects compared to the various LGIP clusters?*
 |  |
|  | *CalWEA LSA* | *Appendix 8* | *October 6, 2010* | ***Transition of Generating Facilities in SGIP Transition Cluster******Section 4.1*** * ***Proposed language***

*An Interconnection Request deemed to be included in the SGIP Transition Cluster (including those Generating Facilities defined as part of the SGIP Serial Study Group who choose to be processed in the SGIP Transition Cluster) that wishes to be studied as an Energy-Only Deliverability Generating Facility shall be processed per the procedures set forth in Appendix Y to the CAISO Tariff and studied as part of the Phase II Interconnection Study for the CAISO’s first and second Queue Clusters, which is scheduled to begin on January 1, 2011 and be completed on July 31, 2011. Alternatively, Interconnection Requests deemed to be included in the SGIP Transition Cluster may, by indicating in writing, within five (5) Business Days from the effective date of this Appendix 8 to the GIP, elect to be studied for Full Capacity deliverability, or, if eligible, as part of the Independent Study Process set forth in Section 4 of Appendix Y.** ***Comments/questions***
* ***Continuation of EO studies for FC projects:*** *The CAISO should clarify that SGIP Transition Cluster projects electing full deliverability would both stay in the SGIP Transition Cluster study (to be completed by July 2011) and enter Cluster #4 (specifically) to be studied under Appendix Y. This would clarify that such projects wanting FC status would not leave the Transition Cluster process but would additionally enter Cluster #4 for that limited purpose, as stated in proposed GIP Section 8.1.2.*
* ***Relative “queue positions” of SGIP and LGIP clusters:*** *We understand that, though LGIP Clusters 1 and 2 are studied together in one Phase II study, Cluster 1 projects are sequenced ahead of Cluster 2 projects in that study, for purposes of determining and allocating transmission-upgrade costs. Is this understanding accurate? If so, what is the relative queue position of the SGIP Transition Cluster in the July 2011 study?*
 |  |
|  | *CalWEA LSA* | *Appendix 8* | *October 6, 2010* | ***Section 4.2*** * ***Proposed language***

*An Interconnection Request deemed to be included in the SGIP Transition Cluster that wishes to be studied as a Full Capacity Deliverability Generating Facility shall be studied for Energy-Only deliverability as part of the Phase II Interconnection Study for the CAISO’s first and second Queue Clusters, with a Full Capacity deliverability assessment to be performed as part of the CAISO’s fourth Queue Cluster, which is scheduled to begin on June 1, 2011.** ***Comments/questions***
* *This provision seems to duplicate Section 4.1 above, with only the Cluster #4 study start-date detail added.*
* *Why can’t SGIP Transition Cluster projects wanting Full Capacity deliverability be studied for that purpose in the same Cluster 1-2 Phase II Study (due July 2011) that is proposed to address their Reliability Network Upgrades as Energy-Only projects? Why must they wait until Cluster 4 for that Deliverability Assessment?*
 |  |
|  | *CalWEA LSA* | *Appendix 8* | *October 6, 2010* | ***Section 4.3**** ***Proposed language***

*An Interconnection Customer in the SGIP Transition Cluster must post, within thirty (30) calendar days of the effective date of this Appendix 8, all of the following: (i) a Study Deposit equal to the amount set forth in Section 3.5.1 of Appendix Y, if it has not done so already; and (ii) a Demonstration of Site Exclusivity, if it has not done so already. An Interconnection Customer that does not satisfy these posting requirements will be withdrawn from the SGIP Transition Cluster. Interconnection Customers who withdraw from the SGIP Transition Cluster will be refunded the entire amount of their Study Deposit upon withdrawal, less any amounts that the CAISO, Participating TO(s), and third parties have incurred in performing studies on the Interconnection Customer’s behalf.** ***Comments/questions***
* ***Site Exclusivity:*** *Requirement (ii) makes no sense here, because SGIP projects had to demonstrate Site Control (a stronger demonstration than “Site Exclusivity”) to have had a valid SGIP IR. Moreover, even if they did not meet this requirement for some reason, they should be allowed to post an “in-lieu” deposit instead, since they are effectively being studied in the (L)GIP process.*
* ***Refund provisions:*** *These provisions should exclude “third parties;” costs for any third parties under CAISO or PTO contract would count under CAISO-/PTO-incurred expenses.*
 |  |
|  | *CalWEA LSA* | *Appendix 8* | *October 6, 2010* | ***Section 4.4*** * ***Proposed language***

*At the conclusion of the Phase II Interconnection Study for the CAISO’s first and second Queue Clusters, each Interconnection Customer remaining in the Transition Cluster shall receive a Phase II study report, which will indicate each Interconnection Customer’s allocated share of costs for Interconnection Facilities and Reliability Network Upgrades. If the Interconnection Customer wishes to continue in the queue, the Interconnection Customer must sign and execute an Interconnection Study Agreement within ninety (90) calendar days of receiving the final report and post the required Financial Security as set forth in Section 9.3 of Appendix Y.** ***Comments/questions:*** *This provision is confusing.*
* *Why would an IC have to execute a Study Agreement after the studies are complete? It makes more sense for the IC, in addition to posting IFS to remain in the queue, to also execute a new Study Agreement at that time.*

*If the study process is per Appendix Y, as noted above, wouldn’t the IFS provisions there apply anyway?* |  |
|  | *SDG&E* | *Appendix A* | *October 7, 2010* | ***Appendix A:*** *SDG&E believes that the allowed time for some of the studies/responsibilities have been reduced unreasonably. The reduction in the number of days for the study process must be re-examined.*  | *The time frames for the study process were included in the final addendum for the proposal.* |
|  | *PGE* | *Appendix A* | *October 6, 2010* | *The tariff language does not include the definition of Site Exclusivity.* | *The Site Exclusivity definition is contained in Appendix A. It is unchanged by this tariff amendment.* |
|  | *PGE* | *General* |  | *PG&E is concerned about the proposed dates for grandfathering SGIP projects in the queue. The Serial Group under the Draft Final Proposal included those SGIP projects who’s Interconnection Requests were received prior to October 1, 2010 and have a signed study agreement no later than July 30, 2010. SGIP projects that qualified for the Serial Group under the Draft Final Proposal would remain as Energy Only. SGIP projects that desired Full Capacity would be studied as part of the Cluster 4 study process.**PG&E is concerned about the December 15, 2010 cut-off date for the Serial Group under Section 1.2.2 of the GIP Appendix 8. This date would leave a considerable amount of SGIP projects in the serial process. The Serial Group would have consisted of 26 SGIP projects in PG&E service territory under the Draft Final Project. With the proposed tariff language, the Serial Group would increase to approximately 70 SGIP projects based on the projects currently in the CAISO queue. PG&E recommends that the CAISO consider making the cut-off date the same as the FERC filing date.* *The CAISO and ICs should be aware that, as based on past experience with the LGIP Serial projects, PG&E cannot guarantee that the SGIP Serial projects will be completed any sooner than the SGIP Transition Group.*  | *The CAISO has adjusted the dates to alleviate potential concerns that the tariff amendment would have retroactive effect, and for this reason, the time frames are revised to be prospective dates.* |
|  | *Sempra* | *General* | *October 6, 2010* | ***ISSUE #1*** *The table shown on the next page is from the matrix issued for discussion at the last SGIP/LGIP Interconnection Procedures stakeholder conference call held on August 20th. Specifically noted in review of the Draft Tariff Language was #3 (highlighted in yellow) as it corresponds to the developed tariff language in Section 8.1 (One Time Full Capacity Deliverability Option). To fully meet the intent of the #3 proposal, clarifying language needs to be included in Section 8.1 to avoid contradiction of new language added to Section 3.1 as described below* ***\*Please Refer to Table in Sempra Comments\*****In the new section - 8.1 One-Time Full Capacity Deliverability Option, the language describes the ability for generators previously studied as EO to be restudied for FC and must do so as stipulated in 8.12:* *8.12 An Interconnection Customer must make such election within the Cluster Application Window for the CAISO‟s fourth Queue Cluster, which will open on March 1, 2011.* *However, in section -* ***3.1 General*** *the following new (and conflicting) language was added:* *If the Interconnection Customer has submitted multiple Interconnection Requests for the same site, then within (10) Business Days after the Scoping Meeting, the Interconnection Customer must chose a single Interconnection Request for that site to continue in the interconnection process and all other requests will be deemed withdrawn.* *To be consistent with the intent of the #3 proposal in the matrix and mitigate the conflicting section 3.1 language, additional language in Section 8.1 is needed to carve out an exception for all projects “previously studied as EO to be restudied as FC” (e.g., “Serial Group, Transition Cluster and Cluster 1/2 „Energy Only‟ projects requesting to participate in the „One-Time Full Capacity Deliverability Option‟ will be allowed to complete their current study processes.”)* *Also, as discussed on the August 20th conference call, to provide certainty that only one Interconnection Agreement will be negotiated for Serial, Transition Cluster and Cluster 1/2 „Energy Only‟ projects that request to participate in the „One-Time Full Capacity Deliverability Option,‟ the Network Upgrade Cost section in the GIA Appendices needs to include provisional language that the Network Upgrade costs are “subject to change” (e.g., “Network Upgrade facilities/costs are subject to change after the requested Full Capacity Deliverability Assessment is completed within the CAISO‟s fourth Queue Cluster.”)*  | *The CAISO believes that the one-time opportunity may be better suited for inclusion in the Transmittal Letter to FERC rather than for inclusion in the tariff language.**The CAISO has decided to remove the language to Section 3.1 that Sempra characterizes as problematic.* |
|  | *Sempra* | *General* | *October 6, 2010* | *On August 30, 2010, the CAISO posted a Technical Bulletin affording the Transition Cluster FC designated projects an opportunity to be assessed for an advisory partial delivery value at the time of its planned COD to mitigate developer‟s financing issues. Future clusters will likely face the same financing issues and therefore should be afforded the same assessment conducted for the Transition Cluster in order to treat all CAISO queued projects equal. Because the assessment conducted for the Transition Cluster was not conducted under any current tariff provision and to ensure that this opportunity will be afforded to future clusters after completion of their respective Phase 2 Studies, SGEN recommends that this specific process be included with new tariff language in this GIP tariff.* | *The CAISO is of the opinion that this matter is best addressed in the stakeholder process scheduled to commence in Dec 2010 or Jan 2011, as it deals with large generator issues. Moreover, there is sufficient time to address this matter as Phase II Studies for later clusters will be conducted in mid-2011.* |