



October 10, 2012

Submitted by email to the CAISO at MarketDesign@caiso.com

RE: LSA comments on updated draft 2012 Stakeholder Initiatives Catalog

The Large-scale Solar Association (LSA) hereby submits these comments on the latest draft version of the draft 2012 Stakeholder Initiatives Catalog (Catalog). The Catalog contains a listing and description of all ongoing and potential enhancements to the ISO market design and infrastructure and planning policies.

LSA's remarks are very brief, addressing just two points in one element from the Catalog: Generator Project Downsizing (Item 12.12).

First, the description of this item should be augmented to add the following information, pursuant to the CAISO Board's directives to Management at the Board meeting in September:

- Consideration of a second opportunity to exercise the one-time project downsizing option after Cluster 5 interconnection studies are complete, to accommodate projects that may not be reasonably able to make such decisions in the upcoming initial window (e.g., Cluster 3 and 4 projects, and those with Commercial Operation Dates (CODs) after 2015 or 2016); and
- Interim report to the Board in late 2013 on the status of that item.

Second, aside from these follow-up activities required by the Board, the proposal (and draft tariff language) has not even been filed at FERC yet. Thus, this item should be removed from Section 12 - Completed Initiatives and placed in Section 10 - Infrastructure and Planning (or one of the other categories of in-progress initiatives) until these follow-up activities are completed.

LSA appreciates the opportunity to comment on the updated Catalog and looks forward to participating in the upcoming initiatives ranking process.