

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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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](mailto: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](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 8<sup>th</sup> 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 – N/A*
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 – N/A*

## Part 2

Please select five topics of greatest importance to you from (i) the 49 topics included in the April 8<sup>th</sup> 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

<b>Topic No.</b> <i>(if one of the 49 topics; otherwise use N/A)</i>	<b>Topic Name</b> <i>(either the topic name used in the Scoping Proposal or, if a new topic provide your own name for the topic)</i>	<b>Rank</b>
N/A	Affected System Study Coordination	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.*

MID and IID strongly support calls by other stakeholders, in particular the Large Scale Solar Association, to address issues associated with affected system studies, and to improve coordination among neighboring systems. The needs of the ISO, developers, and affected systems would be better served by developing concrete, tariff-based procedures that spell out the process to be followed and the obligations of all parties, in order to streamline the process and provide certainty.

2. *Provide a detailed explanation of the rationale for your selection of these five topics and your rankings –*

Both MID and IID have been identified at various stages of the ISO GIP as affected systems and have therefore been in active discussions with generators that are interconnecting to the ISO Controlled Grid, but whose resulting flows affect their

systems. Additionally, MID and IID expect upcoming large clusters of projects in the ISO interconnection queue to affect their systems. Currently, the ISO Tariff lacks specificity with respect to both the process for anticipating and addressing possible issues, and the obligations of the parties. This current confusion helps no one. Affected systems lack information to assess when and how to best participate in the ISO study process and the identity of developers with whom to engage; there are not clear sets of assumptions; developers are often caught by surprise late in the development cycle, and the rights and obligations with respect to the payment for needed upgrades and timing of safe interconnection to the grid, as those issues pertain to affected systems, are not specified clearly in the Tariff. Given the importance of this issue with known generation requiring study by both the ISO and the affected systems, resolution of this matter should not be delayed. Further, it is simply inadequate to shunt this issue to the Business Practice Manual process, as proposed, with unspecified milestones, since the provisions of the Tariff will be implicated in any event. While GIP improvements are being considered, it makes sense to tackle the issue of affected systems now.

3. *Identify which of the 12 topics initially proposed to be in scope you recommend your selected topics should replace – N/A.*