

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Martin Caballero, (209) 526-7590 Sean Neal, (916) 498-0121	Modesto Irrigation District	August 11, 2017

Please use this template to provide your written comments on the stakeholder initiative:

“2017 Expedited GIDAP Enhancements Straw Proposal”

98-0

Comments are due Friday, August 11, 2017 by 5:00pm

The Issue Paper posted on July 21, 2017 and the presentations discussed during the August 4, 2017 stakeholder meeting can be found at CAISO.com or at the following link:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/2017ExpeditedGIDAPEnhancements.aspx>

Please use this template to provide your written comments on the issue paper topics listed below and any additional comments that you wish to provide.

1. Do you support the Extended Parking straw proposal? And why?

Comments: MID cannot say it supports or does not support the Extended Parking straw proposal at this time. MID is concerned that the additional year that would be permitted to park a project would disadvantage Affected Systems, as well as other projects in the CAISO Interconnection Queues that have impacts on Affected Systems. The CAISO notes in its Criterion 2 for Extended Parking, “If a project has a network upgrade assigned to it, which is needed by later clustered projects, parking for a second year will not be allowed.” Straw Proposal p. 12. MID requests whether the CAISO

means by “network upgrade” in Criterion 2 to include those upgrades that are required to meet the mitigation requirements for Affected Systems. Mitigation required to address impacts on Affected Systems due to new interconnections can be caused by crossing certain thresholds that create overflows on Affected Systems. When projects are parked for an extended period of time, it creates uncertainty for projects that entered the interconnection queue at a later date or are part of a later interconnection Cluster. The projects later in the queue/in subsequent Clusters may be exposed to mitigation responsibility that they would not otherwise have, had earlier projects not parked for an extended period. To the extent that the CAISO’s Criterion 2 and use of the term “network upgrades” incorporate the concept of Affected Systems, MID asks the CAISO to further clarify that point in its revised straw proposal and in any proposed Tariff language. To the extent that the CAISO does not intend to include upgrades to mitigate impacts on Affected Systems within its Criterion 2, MID requests the CAISO to reconsider the scope of Criterion 2 to include such upgrades.

2. Do you support the Interconnection Request (IR) Window & Validation Timelines Straw Proposal? And why?

Comments: [Insert comments here]