



California Independent
System Operator Corporation

October 30, 2009

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: Q3 Quarterly Report on Progress in Processing Interconnection Requests;
Docket No. ER08-1317-003**

Dear Ms. Bose:

Pursuant to Paragraph 200 of the Commission's "Order Conditionally Approving Tariff Amendment" issued in this docket on September 26, 2008, 124 FERC ¶ 61,292 (2008), , the California Independent System Operator Corporation ("ISO") respectfully submits by electronic filing the "Q3 2009 Quarterly Report of the California Independent System Operator on Progress In Processing Interconnection Requests."

If there are any questions concerning this filing, please contact the undersigned.

Respectfully Submitted,

/s/ Baldassaro "Bill" DiCapo

Baldassaro "Bill" DiCapo

*Counsel for the California Independent System
Operator Corporation*

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System)
Operator Corporation) Docket No. ER08-1317-003

**Q3 2009 QUARTERLY REPORT OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR ON PROGRESS IN PROCESSING INTERCONNECTION
REQUESTS**

Reporting Period: July 1, 2009 to September 30, 2009

Date: October 30, 2009

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Independent System Operator
Corporation

Part One: Introduction

The California Independent System Operator Corporation (“ISO”) submits this “Q3 2009 Quarterly Report of the California Independent System Operator on Progress in Processing Interconnection Requests.” The report is submitted pursuant to the Commission’s order that the ISO submit quarterly reports on the ISO’s processing of interconnection requests under the Generator Interconnection Process Reform (GIPR), which is the ISO’s reformed interconnection process approved by the Commission on September 26, 2008.

The Reporting Requirement and Prior Quarterly Reports

In the Commission’s September 26, 2008 Order Conditionally Approving Tariff Amendment (*California Independent System Operator Corp.* 124 FERC ¶ 61,292 (2008) (hereinafter, “September 26 Order”)) the Commission approved the ISO’s new interconnection process and timelines and included a requirement that the ISO submit periodic reports on the ISO’s progress in processing interconnection requests, as a tool to evaluate whether the ISO’s new, reformed process is working as planned. Paragraph 200 of the order contains the reporting requirement.

This report covers the period from July 1, 2009 through September 30, 2009, which is the third quarter of this year (“referenced as Q3 2009”). This is the ISO’s fourth report following issuance of the order. Prior reports are

The ISO’s Q4 2008 Quarterly Report, dated and filed February 27, 2009¹;

The ISO’s Q1 2009 Quarterly Report, dated and filed April 30, 2009²; and

The ISO’s Q2 2009 Quarterly Report, dated and filed July 30, 2009³.

¹ Accessible on the ISO’s Web site at <http://www.caiso.com/2362/2362d4e612850.pdf>

² Accessible on the ISO’s Web site at <http://www.caiso.com/23a0/23a0de6d701a0.pdf>

³ Accessible on the ISO’s Web Site at <http://www.caiso.com/2403/2403907271f30.pdf>

Part Two: A Description of the Components of the Interconnection Queue

The heart of the reform of the Large Generator Interconnection Process (LGIP) under the GIPR Amendment is a change from a serial process (processing requests sequentially in the order received) to a cluster process (processing requests in clusters received during a request window period).

As an initial step, before the GIPR Amendment was filed, the ISO made a waiver request to FERC relating to the processing of interconnection requests. Following the Commission's grant of the ISO's waiver request⁴, the ISO grouped the existing interconnection requests into four categories. These four categories make up the existing four components of the interconnection queue. The component number (1 through 4) generally corresponds to time (i.e. Component 1 generally consists of that group of interconnection requests that are oldest in time). However, this is not exactly so, as the groupings were also based on common characteristics (i.e. studies were already completed) that make collective treatment of the individual requests within the group more logical. This means that some interconnection requests which were older in time are part of Component 2 rather than Component 1.

As time progresses, new interconnection requests will be received (in clusters) and each new cluster will become a new component of the overall interconnection queue. As the currently pending individual interconnection customers complete the interconnection process (or withdraw), and exit the queue, the current queue components of which they are part of will be completed, and that queue component will fall away from the active interconnection queue. Because the requests progress in this manner, the interconnection queue is a dynamic tracking device. The quarterly report represents a snapshot of the interconnection queue at the end of each quarter.

Queue Components 3 (the Transition Cluster) and 4 (the First Queue Cluster) are the groupings of requests which are subject to the reporting requirement under the

⁴ On May 15, 2008, the ISO filed the Waiver Petition in Docket No. ER08-960, seeking a one-time waiver of limited provisions of the then-effective ISO tariff governing generator interconnection, in order to facilitate the transition between the ISO's original pro-forma LGIA and LGIP regime to the new Generator Interconnection Process Reform ("GIPR") process. On July 14, 2008, the Commission issued an order granting the ISO's waiver request. (*California Indep. System Operator*, 124 FERC ¶ 61,013 (2008).)

September 26 Order. However, Categories 1 and 2 (consisting of earlier, still pending requests that are being handled serially) have also been included in this report, to give fuller context to the ISO's efforts to process its interconnection queue.

Interconnection Requests Subject to the New Procedures

The Transition Cluster. The Transition Cluster is the first group of generation interconnection requests to be handled under the GIPR process. The term "Transition Cluster" reflects the fact that this is a grouping of requests that were received before the GIPR LGIP was in place, but, with Commission approval, has been transitioned into the new process. In terms of the four categories, the Transition Cluster is Component 3.

Component 3 This component consists of the projects in the Transition Cluster. The Transition Cluster consists of LGIP Interconnection Requests

- (i) that had been made under the ISO's 2005 version of the LGIP,
- (ii) were still pending as of June 2, 2008, but
- (iii) which the ISO did not assign to the Serial Study Group.⁵

This category of interconnection requests is being processed under ISO Tariff Appendix Y, *Large Generator Interconnection Procedures (LGIP) for Interconnection Requests in a Queue Cluster Window*, and Appendix 2 to Appendix Y, *Large Generator Interconnection Procedures (LGIP) Relating to the Transition Cluster*.

⁵ As the ISO explained in its transmittal letter transmitting its GIPR Amendment request to FERC on July 28, 2008:

The Serial Study Group consists of certain "late stage" Interconnection Requests, which the CAISO will continue to study serially and pursuant to existing timelines. The CAISO elected to define late stage Interconnection Requests as those that either: (1) had met specific advanced milestones in the current LGIP Interconnection Study process, (2) had a power purchase agreement approved, or pending approval, by the CPUC or Local Regulatory Authority, or (3) were next in queue order to interconnect to any transmission project that has received land use approvals from any local, state, or federal entity, as applicable, up to the capacity studied by the CAISO. The CAISO explained that these criteria were logical and consistent with the Commission's guidance in the March 20 Order.

ISO Transmittal Letter to FERC submitted the ISO's GIPR Tariff Initiative, sated July 28, 2008 at p10.n 15. The ISO's Transmittal Letter can be accessed on the ISO's Web site at <http://www.aiso.com/2012/2012c70a7880.pdf> .

The First Queue Cluster. As mentioned above, under the new GIPR LGIP, the ISO processes interconnection requests in clusters, with each cluster consisting of those requests that have been collected during an open request window. The ISO opens a request window to receive interconnection requests. When the request window closes, all of the eligible requests constitute a cluster, and the clustered projects are studied and otherwise handled on the same time line. (A graphic that depicts the LGIP stages and timelines is included at the end of this report). Under the GIPR LGIP, the ISO opens a request window two times per year. In terms of the four current components to the interconnection queue, the First Queue Cluster is Component 4.

Component 4 The component consists of those interconnection requests received under the First Queue Cluster. The First Queue Cluster is the first group of Interconnection Requests to be processed entirely (from receipt of request to executed interconnection agreement and physical interconnection) under the approved GIPR LGIP. All interconnection requests received during the period from June 2, 2008 to July 31, 2009 are being placed in this category, and are being processed under ISO Tariff Appendix Y, *Large Generator Interconnection Procedures (LGIP) for the Interconnection Requests in a Queue Cluster Window*).

Interconnection Requests Subject to Pre-GIPR Procedures

This report also includes information on the ISO's processing of the earlier pending interconnection requests that are not being processed under the reformed, cluster interconnection process (i.e. the GIPR LGIP). In terms of the four categories, these groupings are Categories 1 and 2.

Component 1 The interconnection requests placed in this category comprise certain projects that predated the Serial Study Group. These requests were grouped together because, at the time the ISO made its waiver request, the associated interconnection studies for these projects had already been completed. The projects themselves were being processed under one of two processes, as applicable. The projects are either processed under the ISO's "Amendment 39 procedures, or the ISO's 2005 version of the ISO LGIP.

The ISO is finishing out these projects under the pertinent process under which the interconnection requests were made. (In the case of those projects under the Amendment 39 procedures, this is ISO Tariff Appendix W, *Interconnection Procedures in Effect Prior to July 1, 2005 ("Amendment 39 Procedures")*); in the

case of requests made under the ISO’s 2005 version of the LGIP (i.e. the procedures which preceded the GIPR Amendment) that process is ISO Tariff Appendix U, *Standard Large Generator Interconnection Procedures (LGIP).*)

Component 2 The Serial Study Group comprises this category. Applying the same approach as with the Component 1, the ISO is processing this group under the process which was in place when these requests were first made to the ISO. For all of the projects in this component, the applicable process is the 2005 version of the LGIP (i.e. the procedures which preceded the GIPR Amendment), This process is set forth within ISO Tariff Appendix U, *Standard Large Generator Interconnection Procedures (LGIP)*;

Part Three: Composition of GIPR Interconnection Requests By Technology

The Transition Cluster (Component 3)

The breakdown by technology of interconnection customers in the Transition Cluster is as follows:

Table 1						
Transition Cluster Interconnection Customers						
Categorized by Prime Mover Technology						
Prime Mover	Number	Technology				
		B	G	NG	S	W
Steam Turbine	42	1.5	7		33.5	
Photovoltaic	28				28	
Wind Turbine	16					16
Combined Cycle	11			11		
Combined Cycle/PV	1			0.5	0.5	
Combustion Turbine	4			4		
Reciprocating Engine	1			1		
Other	2				2	
Total	105	1.5	7	16.5	64	16

B=Biomass; G=Geothermal; NG=Natural Gas; S=Solar; W=Wind

The First Queue Cluster (Component 4)

The breakdown by technology of interconnection customers in the First Queue Cluster is as follows:

Table 2						
First Queue Cluster Interconnection Customers						
Categorized by Prime Mover Technology						
Prime Mover	Number	Technology				
		WTR	NU	NG	S	W
Steam Turbine	9		1		8	
Photovoltaic	10				10	
Wind Turbine	3					3
Combined Cycle	2			2		
Wind Turbine/PV	1				0.5	0.5
Combustion Turbine	1			1		
Hydraulic Turbine	1	1				
Total	27	1	1	3	18.5	3.5

WTR=Water; NU=Nuclear; NG=Natural Gas; S=Solar; W=Wind

Part Four: Progress in Processing the Interconnection Requests

The Transition Cluster (Component 3)

Table 3 Queue Component 3: The Transition Cluster	Q3 2009	Q2 2009
Active Projects as of beginning of Quarter	108	108
Transition Cluster eligible Projects having withdrawn during the Quarter	(4)	0
Projects added to Transition Cluster during the Quarter	1	0
Active Transition Cluster Projects as of end of Quarter	105	108

The Transition Cluster currently consists of 105 interconnection requests. During Q3, four additional projects withdrew and one other project was added to the Transition Cluster Study process which had been studied previously under a Participating Transmission Owner's Wholesale Distribution Access Tariff.⁶

The Transition Cluster is currently in a period between the conclusion of the Phase I interconnection study work and the commencement of the Phase II studies. Interconnection customers are determining whether to proceed in the interconnection process or withdraw. In order to participate in Phase II, interconnection customers must post financial security instruments for network upgrades and Participating Transmission Owner interconnection facilities. On September 18, the ISO submitted a tariff amendment to the LGIP, which included changes to the structure and amounts of the financial security instrument postings.⁷ Interconnection customers must post financial security instruments on or before December 15, 2009.

⁶ As shown in previous reports, the Transition Cluster consisted of 230 eligible interconnection customers as of September 26, 2008, the effective date of the FERC's order approving the GIPR amendment. Under the GIPR LGIP, the Transition Cluster customers were required to make a \$250,000 study deposit and an additional \$250,000 deposit if site exclusivity had not been established. One hundred and eight projects made the deposits and moved forward, and the other 122 were deemed withdrawn.

⁷ FERC Docket No. ER09-1722.

The First Queue Cluster (Component 4)

Table 4 Queue Component 4: Requests Within the First Queue Cluster under GIPR LGIP	Q3 2009	Q2 2009
Interconnection Requests received by end of Quarter	37	13
Number of Interconnection Requests that withdrew during the Quarter	(5)	(5)
Total Interconnection Requests	27	8

The window period for interconnection requests for the First Cluster closed on July 31. The ISO received 37 interconnection requests in total over the window period. Ten parties who submitted interconnection requests during the window period later withdrew over the window period (five during Q2 and another 5 during Q3) The remaining 27 interconnection request will proceed in the First Cluster Interconnection Study.

The ISO is working closely with the Participating Transmission Owners to group the First Cluster and develop power flow base cases in preparation for the Phase I Studies. The Phase I Study reports for this component are scheduled for completion by March 31, 2010.

The Serial Study Group (Component 2)

Table 5 Queue Component 2: The Serial Study Group	Q3 2009	Q2 2009
Number of projects in Category 2	76	76
Number of projects which have completed interconnection process	2	1
Number of projects to be completed	70	74
Number of projects that have withdrawn from Serial Study Group	(4)	(1)
<u>Breakdown by milestone</u>		
<u>Study Work</u>		
Projects for which studies are completed	39	37
Projects for which Systems Impact Study is in progress	1	3
Projects for which Facilities Study is in progress	30	35
Projects for which Feasibility Study is in progress	0 Feasibility studies either not applicable completed, or waived	0 Feasibility studies either not applicable, completed or waived
<u>Interconnection Agreements</u>		
Projects with completed studies for which LGIA not completed	28	28
Projects for which studies completed and LGIAs signed but which have not yet come online	11	8
Projects with signed LGIAs, which have completed Interconnection process and are now online and with declared Commercial Operation Date (COD).	1	1

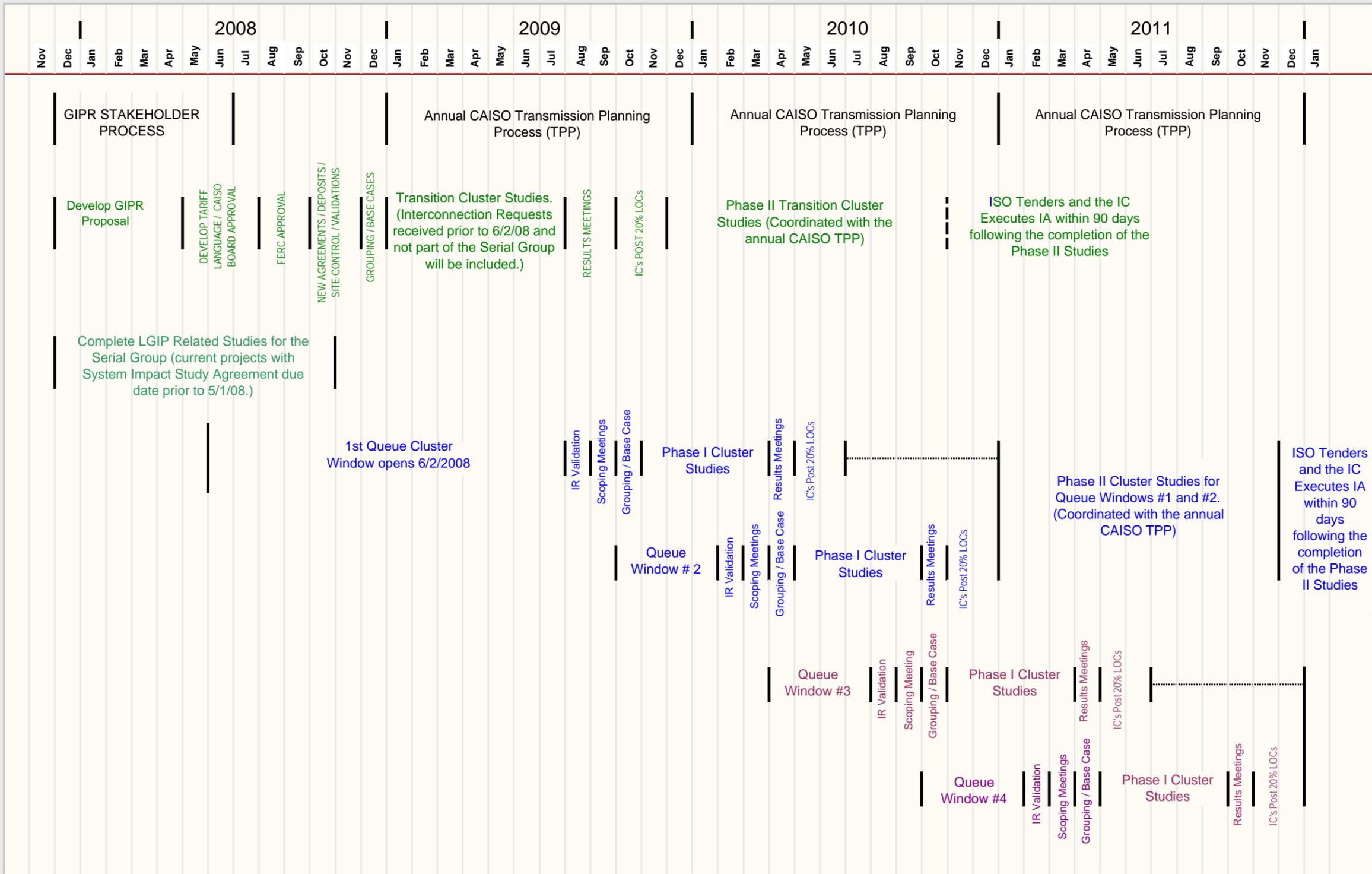
Seventy-six projects are referenced in this category. During Q3, three projects withdrew from the interconnection process, at the customers' request. As Table 5 shows, various projects completed study milestones, some projects completed the study cycle, and three additional projects have executed LGIAs but have not yet come online.

Requests Under the Amendment 39 Process and/or Pre GIPR LGIP, for Which Study Work had Already Been Completed at the Time the ISO Requested Approval of the GIPR LGIP (Component 1)

Table 6 Component 1 Projects	Q3 2009	Q2 2009
Number of projects in this category	43	43
Number of projects which have completed interconnection process	18	16
Number of projects which have not completed interconnection process	22	24
Number of withdrawn requests	(3)	(3)
<u>Breakdown of the status of projects in this Category</u>		
Projects with completed studies for which LGIA not completed	1	3
Projects for which studies and LGIAs signed but which have not yet come online	21	21
Projects with signed LGIAs, which have completed Interconnection process and are now online and with declared Commercial Operation Date (COD).	18	16

Forty-three projects are in this category. Three interconnection requests were designated as withdrawn during Q2, and there have been no further withdrawals in Q3. Two projects completed the interconnection process and became operational in Q3.

Generation Interconnection Process Reform (GIPR) Proposal Timelines Transition Cluster and Future Cluster Windows



Certificate of Service

I hereby certify that I have this day served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated this 30th day of October, 2009 at Folsom, California.

/s/ Jane Ostapovich

Jane Ostapovich