

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 Draft Final Proposal for Topics 6-12 posted on July 2 and as supplemented by the presentation and discussion during the July 10 stakeholder web conference.

Submit comments to GIP@caiso.com

[Comments are due July 19, 2013 by 5:00pm](#)

The Draft Final Proposal for Topics 6-12 posted on July 2 may be found at:

http://www.caiso.com/Documents/DraftFinalProposal_Topics6-12_InterconnectionProcessEnhancements.pdf

The presentation discussed during the July 10 stakeholder web conference may be found at:

http://www.caiso.com/Documents/Agenda_Presentation-InterconnectionProcessEnhancementsJul10_2013.pdf

Following each topic listed below, the ISO poses specific questions and requests that stakeholders respond to each.

Topic 6 – Provide for ability to charge customer for costs to process a material modification request

Please select one of the following options to indicate your organization's overall level of support for the proposal on Topic 6:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

PG&E supports with qualification the draft final proposal to charge customers for costs to process a material modification request on a time and expense basis. The administrative and compliance burden associated with billing interconnection customers for time and expense is PG&E's primary concern. However, while not explicitly stated in the draft final proposal, PG&E interprets the CAISO's statement in the draft final proposal that it would expand existing mechanisms to charge for the modification request as meaning that the CAISO would handle the accounting for material modification requests via the existing study process cost recovery mechanism and would provide PTOs with a charge code for billing T&E for material modification requests.

If the CAISO confirms this is the case, PG&E withdraws its qualification and will fully support the proposal.

Topic 7 – COD modification provision for small generator projects

Please select one of the following options to indicate your organization's overall level of support for the proposal on Topic 7:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

PG&E fully supports the draft final proposal for this topic and believes it is in the interest of all parties to make these provisions consistent with the LGIP/LGIA language.

Topic 8 – Length of time in queue provision for small generator projects

Please select one of the following options to indicate your organization's overall level of support for the proposal on Topic 8:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

PG&E fully supports the draft final proposal for this topic and believes it is in the interest of all parties to make these provisions consistent with the LGIP/LGIA language.

Topic 9 – Clarify that PTO and not ISO tenders GIA

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 9:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

PG&E fully supports the draft final proposal for this topic.

Topic 10 – Timeline for tendering draft GIAs

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 10:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

PG&E fully supports the draft final proposal for this topic.

Topic 11 – LGIA negotiations timeline

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 11:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

PG&E fully supports the draft final proposal for this topic.

Topic 12 – Consistency of suspension definition between serial and cluster

Please select one of the following options to indicate your organization’s overall level of support for the proposal on Topic 12:

1. Fully support;
2. Support with qualification; or,
3. Oppose.

If you choose (1) please provide reasons for your support. If you choose (2) please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3) please explain why you oppose the proposal.

PG&E fully supports the draft final proposal for this topic.

Other comments

Stakeholders are asked to comment on any other aspects of the Draft Final Proposal for Topics 6-12 for which they would like to provide comments.