

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the 2018 IPE stakeholder initiative **Addendum #2 to the Draft Final Proposal** posted on December 21, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due January 11, 2019 by 5:00pm

The Addendum #2 to the draft final proposal posted on December 21, 2018 and the presentation discussed during the January 3, 2019 stakeholder meeting can be found on the CAISO webpage at the following link:

<http://www.aiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>

Please use this template to provide your written comments on the Issue Paper topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Issue Paper for convenience.

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

Overall, PG&E supports the spirit behind the CAISO's changes to Section 7.1 of the 2018 IPE. However, PG&E is concerned about aspects to the PTO network upgrade cost responsibility milestone to posting of third Interconnection Financial Security (IFS).

PG&E provides the following comments in response to the seven items outlined in the CAISO's 2018 IPE Addendum #2 to Draft Final Proposal:

1. Maximum Cost Exposure is not static but dynamic (i.e., allowed to increase and decrease): PG&E has no additional comments on this aspect of the proposal.
2. Interconnection Service Reliability Network Upgrades (ISRNU) allocation: PG&E supports the CAISO's recommendation on this portion of the proposal.
3. PTO network upgrade cost responsibility milestone to posting of third IFS: PG&E does not agree with the CAISO's recommendation of GIA execution as a trigger for PTO funding of Network Upgrades, as opposed to 3rd Financial Security postings, because it will likely shift additional costs from interconnection customers to ratepayers.
4. Conditionally Assigned Network Upgrades (CANU) allocation treatment in the Phase I study: PG&E has no additional comments for this portion of the proposal.
5. Projects needing to fund a PNU or CANU early to achieve COD or deliverability: PG&E is supportive of the CAISO's recommendation for this portion of the proposal.
6. RNU Reimbursement cap impacts from CANU-to-ANU conversion: PG&E is supportive of the CAISO's recommendation for this portion of the proposal.
7. Additional developer reimbursement when later-queued projects utilize RNU previously developed: PG&E is supportive of the CAISO's recommendation for this portion of the proposal.

10. Additional Comments

PG&E has no additional comments.