



## Comments of Pacific Gas and Electric Company Interconnection Process Enhancements Topics 1 & 2 Draft Tariff Language

| Submitted by   | Company                                    | Date Submitted   |
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the CAISO's Interconnection Process Enhancements Topics 1 & 2 Draft Tariff Language. In order to easily see PG&E's proposed redline to the CAISO's tariff language, PG&E is showing a clean version of the CAISO's draft language. We have only included the sections of the tariff where PG&E has recommended changes, with our comments shown in redline. We will also provide a separate Word version of PG&E's redline for the CAISO's convenience.

Please let us know if you have any questions, and we look forward to continued collaboration with the CAISO and other stakeholders throughout the rest of this initiative.

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### **3.10.4 Generator Downsizing Request**

An Interconnection Customer that wishes to utilize the annual Generator Downsizing Process, and meets the eligibility requirements set forth in Section 3.10.3, must submit a Generator Downsizing Request application to the CAISO in the form set forth on the CAISO Website. The CAISO will forward a copy of the submitted Generator Downsizing Request application to the applicable Participating TO(s)- within five (5) business days after the close of the applicable Generator Downsizing Request Window.

The CAISO will evaluate for eligibility to be included in the annual Generator Downsizing Process all Generator Downsizing Requests that are submitted during the applicable Generator Downsizing Request Window.

#### **3.10.5.2.1 Notification and Execution of Downsizing Generator Payment Obligation Agreement**

The CAISO will notify the Interconnection Customer no later than ten (10) Business Days after the close of the applicable Generator Downsizing Request Window whether its Generator Downsizing Request is deemed complete, valid, and ready to be studied. If the Generator Downsizing Request is deemed complete, valid, and ready to be studied, the CAISO will execute the Downsizing Generator Payment Obligation Agreement provided by the Interconnection Customer pursuant to Section 3.10.5.1(iv), ~~and~~ provide a copy of the executed agreement to the Interconnection Customer-, and notify the Participating TO(s).

#### **3.10.5.2.2 Deficiencies in the Request as to Application Information**

A Generator Downsizing Request will not be considered to be a valid request until the CAISO determines that the information contained in the Generator Downsizing Request is complete and that the Interconnection Customer has complied with all of the requirements of Section 3.10.5.1.

The CAISO will provide the Interconnection Customer with an opportunity to cure a deficiency in the Generator Downsizing Request only if the deficiency pertains to the application required by Section 3.10.5.1(i). In that event, the CAISO will notify the Interconnection Customer, at the time it provides its notification in Section 3.10.5.2.1, of the reason(s) that the application is deficient and will request additional information to cure the deficiency. In order to remain eligible to participate in the associated Annual Downsizing Process set forth in Section 3.10, the Interconnection Customer must provide the additional requested information needed to constitute a valid Generator Downsizing Request. Whenever the Interconnection Customer provides additional requested information, the CAISO will notify the Interconnection Customer within five (5) Business Days of receipt of that information whether the Generator Downsizing Request is valid. If the Generator Downsizing Request continues to fail to meet the requirements set forth in Section 3.10.5.1(i), the CAISO will include in its notification to the Interconnection Customer the reasons for such failure. If a Generator Downsizing Request has not been deemed valid, the Interconnection Customer must submit all information necessary to meet the requirements of Section 3.10.5.1(i) no later than twenty (20) Business Days after the close of the applicable Generator Downsizing Request Window or ten (10) Business Days after the CAISO first provided notice that the Generator Downsizing Request was not valid, whichever is later.

A Generator Downsizing Request that has not met the requirements of Section 3.10.5.1(i) within twenty (20) Business Days after the close of the applicable Generator Downsizing Request Window or ten (10) Business Days after the CAISO first provided notice that the Generator Downsizing Request was not valid, whichever is later, will be deemed invalid and will not be studied in the next reassessment to be performed pursuant to this GIDAP.

If the Generator Downsizing Request is deemed invalid, the CAISO will notify the Participating TO(s), and refund the Interconnection Customer's Generator Downsizing Deposit, less any costs incurred in validating the Generator Downsizing Request.

### **3.10.6 Withdrawal of Generator Downsizing Request**

An Interconnection Customer may withdraw its Generator Downsizing Request anytime before the close of the applicable Generator Downsizing Request Window, but may not do so thereafter. Following a timely withdrawal under this Section 3.10.6, the CAISO will notify the Participating TO(s), and refund the Generator Downsizing Deposit of the Downsizing Generator, less any costs incurred by the CAISO and applicable Participating TO(s), or third parties at the direction of the CAISO or applicable Participating TO(s) in validating the Generator Downsizing Request.

### **3.10.12 Reflecting Plan of Service Changes in GIAs**

After the completion of the reassessment process performed pursuant to Section 7.4, each Downsizing Generator that has (1) a Generator Downsizing Request that is approved pursuant to this GIDAP and (2) an executed Generator Interconnection Agreement, a draft amendment to the Generator Interconnection Agreement that reflects the Generator Downsizing Request of the Downsizing Generator will be provided as soon as possible. The reassessment report is considered an amendment to the Generator Interconnection Agreement until the Generator Interconnection Agreement can be formally amended. If the CAISO, applicable Participating TO(s), and Downsizing Generator have not begun negotiating or are in the process of negotiating a Generator Interconnection Agreement, the Generator Interconnection Agreement they negotiate will reflect the Generator Downsizing Request of the Downsizing Generator.

### **8.9.4 Parking for Option (A) Generating Facilities**

For an Option (A) Generating Facility in the current Interconnection Study Cycle which either was allocated less TP Deliverability than requested or does not desire to accept the amount allocated the Interconnection Customer shall select one of the following options:

- (1) Withdraw its Interconnection Request
- (2) Enter into a GIA, in which case the Interconnection Request shall automatically convert to Energy Only Deliverability Status. In such circumstances, upon execution of the GIA, any Interconnection Financial Security shall be adjusted to remove the obligation for Interconnection Financial Security pertaining to LDNUs
- (3) Park the Interconnection Request; in which case the Interconnection Request may remain in the Interconnection queue until the next allocation of TP Deliverability in which it may participate in accordance with the requirements of Section 8.9.2. Parking an Interconnection Request does not confer a preference with respect to any other Interconnection Request with respect to allocation of TP Deliverability.

An Interconnection Customer that selects option (2) or (3) above may, at the time it selects the option, elect to reduce the generating capacity of its Generating Facility pursuant to Section 3.10 of this GIDAP.

### **8.9.5 Partial Allocations of Transmission Based Deliverability to Option (A) and Option (B) Generating Facilities**

If a Generating Facility is allocated TP Deliverability in the current Interconnection Study Cycle in an amount less than the amount of Deliverability requested, then the Interconnection Customer must choose one of the following options:

- (i) Accept the allocated amount of TP Deliverability and reduce the MW generating capacity of the proposed Generating Facility such that the allocated amount of TP Deliverability will provide Full Capacity Deliverability Status to the reduced generating capacity;
- (ii) Accept the allocated amount of TP Deliverability and adjust the Deliverability status of the proposed Generating Facility to achieve Partial Capacity Deliverability corresponding to the allocated TP Deliverability;
- (iii) For Option (A) Generating Facilities, accept the allocated amount of TP Deliverability and seek additional TP Deliverability for the remainder of the requested Deliverability of the Interconnection Request in the next allocation cycle. In such instance, the Interconnection Customer shall execute a GIA for the entire Generating Facility having Partial Capacity Deliverability corresponding to the allocated amount of TP Deliverability. Following the next cycle of TP Deliverability allocation, the GIA shall be amended as needed to adjust its Deliverability status to reflect any additional allocation of TP Deliverability. At this time the Interconnection Customer may also adopt options (i) or (ii) above based on the final amount of TP Deliverability allocated to the Generating Facility. There will be no further opportunity for this Generating Facility to participate in any subsequent cycle of TP Deliverability allocation; or
- (iv) Decline the allocated amount of TP Deliverability and either withdraw the Interconnection Request or convert to Energy Only Deliverability Status. An Interconnection Customer having an Option (A) Generating Facility that has not previously parked may decline the allocation of TP Deliverability and park until the next cycle of TP Deliverability allocation in the next Interconnection Study Cycle.

An Interconnection Customer that selects option (iii) or (iv) above may, at the time it selects the option, elect to reduce the generating capacity of its Generating Facility pursuant to Section 3.10 of this GIDAP.

#### **8.9.6 Declining TP Deliverability Allocation**

An Interconnection Customer having an Option (A) Generating Facility that has not previously parked and is allocated the entire amount of requested TP Deliverability may decline all or a portion of the TP Deliverability allocation and park the Generating Facility Request as described in Section 8.9.4(3). An Interconnection Customer that selects this option may, at the time it selects the option, elect to reduce the generating capacity of its Generating Facility pursuant to Section 3.10 of this GIDAP.