



**Comments of Pacific Gas and Electric Company
Generator Interconnection Reform Phase 2 Tariff Language**

Submitted by	Company	Date Submitted
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PG&E applauds the CAISO's efforts in putting together a broad set of reforms and effectively incorporating stakeholder concerns throughout the process. PG&E believes that the proposed Tariff language would effectively implement the policies as approved by the Board in August, but offers the following requests for clarification.

Section 7.1 (ii) – PG&E requests clarification in the following sentence: "Generating Facilities obtaining Full Capacity Deliverability Status under the annual full capacity deliverability option will be placed after the cluster that completes its Phase II Interconnection Study immediately before the annual full capacity deliverability assessment."

Which "annual full capacity study" is this sentence referring to if not the current cluster under study? Aside from the cluster studies, there is no other annual full capacity study. The annual deliverability study was intended to capture the "available" capacity.

Section 7.1 (iii) – PG&E requests clarification on the definition of "lowest transfer distribution factor." This references Section 6.5.2, which describes the deliverability assessments. However, there is no mention of this term in that section.

Section 8.4 (non-PTO interconnections) - The language does not address how to handle those projects that have already completed their interconnection studies, but where the CAISO was not involved in conducting the study.