

Stakeholder Comments Template

Submitted by	Company	Date Submitted
<i>Fernando E. Cornejo</i> <i>fernando.cornejo@sce.com</i>	<i>Southern California Edison</i>	<i>July 19, 2013</i>

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.

SCE supports with qualification the ISO's proposal on Topic 6. Although SCE supports the ability to charge an interconnection customer for costs to process a material modification request, SCE disagrees that the charge should be based on actual costs, requiring a \$10,000 deposit and potentially a subsequent refund. The costs to an interconnection customer should be a fixed fee based on a reasonable estimate of the actual costs incurred to process such requests. If the ISO ultimately elects to have the costs recovery based on actual costs, it must require a separate deposit to process a material modification request. The current ISO proposal to allow an IC to use existing study funds already deposited, if available, is not feasible as it is indeterminable what funds, if any, are available during the study phase.

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.

SCE fully supports allowing small generators to be treated similar to large generators with respect to project changes, including the ability to request changes to COD, technology, point of interconnection or change of ownership and ability to build standalone network upgrades. SCE's support of this parity treatment between small and large generators is predicated on the ISO's proposal that such request will be evaluated against the Material Modification standard and reviewed by the PTO prior to the ISO's written reply to the request.

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.

SCE supports with qualification having the length of time a small generator project can remain in queue to be the same as what is allowed for a large generator project (i.e. 10 years from the interconnection request date to the in-service date for serial projects, and 7 years between the two same milestones for cluster projects). SCE agrees with LSA's comments that, generally, small generators should be subject to the same rules, and have the same opportunities as the large generators. However, the 7-year development timeframe for projects going through either the ISP or Fast Track study processes should be shortened to reflect their shorter study duration.

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.

SCE fully supports the proposal to clarify that the PTO, and not ISO, tenders the draft GIA.

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.

SCE fully supports the proposed timeline for tendering draft GIAs. SCE agrees that the trigger event for when the clock begins to run before providing generators with draft GIAs should be the Results Meeting. SCE supports this change for two reasons. First, by making the Interconnection Customer's (IC) Results Meeting the appropriate trigger, this change will allow changes resulting from the IC Results Meeting to be reflected in the draft GIA issued to the IC, rather than the current process whereby the draft GIA may need to be modified after the Results Meeting. Further, the current 30-day window for tendering a draft

GIA after completion of the Phase II studies and the additional ninety days to negotiate a GIA are unrealistic due to the volume of interconnection requests processed at the same time given the cluster process.

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.

SCE fully supports the proposed timeline for LGIA negotiations. Since the ISO proposal regarding the timeline for tendering a draft GIA (see Topic 10 above) should be triggered off of the Results Meeting date, the negotiation period should also be triggered off of the Results Meeting.

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.

SCE fully supports the ISO’s proposed amendment to the serial LGIA required in the future and LGIAs that have not been substantially negotiated in order to specify that suspension only applies to PTO upgrades that do not impact other projects, and does not provide a day-for-day delay of the project.

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.