

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the 2015 Interconnection Process Enhancements (IPE) Issue Paper/Straw Proposal for Topics 1- 11 that was posted on March 23, 2015 and as supplemented by the presentation and discussion during the March 30, 2015 stakeholder meeting.

Submit comments to initiativeComments@caiso.com

[Comments are due April 10, 2015 by 5:00pm](#)

The Issue Paper/Straw Proposal for Topics 1- 11 that was posted on March 23, 2015 may be found at:

http://www.caiso.com/Documents/IssuePaper-StrawProposal_InterconnectionProcessEnhancements2015.pdf

The presentation for the March 30, 2015 stakeholder meeting is available on the ISO website

at: http://www.caiso.com/Documents/Agenda-Presentation-InterconnectionProcessEnhancements2015_IssuePaper-StrawProposal.pdf

For each topic, please select one of the following options to indicate your organization's overall level of support for the CAISO's proposal:

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.

Topic 1 – Affected Systems

SMUD appreciates the CAISO providing this stakeholder process for interested parties to comment.

As an initial item regarding Topic 1, SMUD “supports with qualification.”

While SMUD understands the CAISO’s rationale for establishing more structure around the notification process for potentially Affected Systems, SMUD requests a few changes to the proposed process to make it more reasonable and less punitive. Significant mitigation costs are at stake if forfeited by a potentially affected system, and if the CAISO wishes to create a point-of-no-return rule for self-identification by potentially affected systems, the following changes should be made:

- 1) The proposed 30-day window between the Interconnection Financial Security notification and when a potentially Affected System must make an affirmative response is too brief. SMUD, like many other affected systems, does not continuously monitor the CAISO Clusters and may have other business and resource priorities at the time of notification, which makes such a short window difficult to assess the interconnection and potential effects. Instead, SMUD recommends at least a 60-day window. An additional 30 days should not have a material impact on the CAISO’s interconnection study processes or timeline for interconnection.
- 2) SMUD requests the CAISO clarify that if a potentially Affected System is not notified by the CAISO, and the Affected System comes forward at a future date after the established timeline, any mitigation required to mitigate an interconnection will not be the responsibility of the Affected System. SMUD believes this is the intent of the CAISO, but it is not clearly stated in the proposed tariff language. Accordingly, SMUD recommends adding language like the following to section 3.7 of Appendix DD of the CAISO Tariff:

If the CAISO fails to notify the potentially Affected System of potential impacts of an interconnection and the potentially Affected System comes forward to identify itself after the established 60 calendar day timeline as an Affected System, any mitigation required to mitigate the impacts identified by the Affected System will

be the responsibility of the CAISO, Participating Transmission Owner(s) or the Interconnection Customer.

- 3) SMUD requests the CAISO provide the required notice to at least two contacts at a potentially Affected System. With a hard deadline for an affirmative response, this will provide adequate coverage in the event one contact is on vacation, traveling for business, has moved positions internally, changed jobs and no longer works for the Affected System, or retired. In addition, SMUD requests the CAISO post the contact list on its web site, or otherwise make the list publically available, so an Affected System can verify that the CAISO has the correct contact information (for example, an email address may be misspelled).

SMUD recognizes that this Issue Paper/Straw Proposal is limited to addressing the notification of potentially Affected Systems, which is an important item. However, an even more important issue for SMUD regarding the CAISO interconnection process is the CAISO's over-reliance on congestion management to mitigate the impacts affecting Affected Systems. SMUD simply raises this as a concern and looks forward to another stakeholder process that addresses this important matter.

SMUD takes no position at this time on the remaining topics 2-11, but reserves the right to do so at a later date.

Topic 2 – Time-In-Queue Limitations

Topic 3– Negotiation of Generator Interconnection Agreements

Topic 4 -Deposits

Interconnection Request Study Deposits

Limited Operation Study Deposit

Modification Deposits

Repowering Deposits

Topic 5 - Stand-Alone Network Upgrades and Self-Build Option

Topic 6 - Allowable Modifications Between Phase I and Phase II Study Results

Topic 7 – Conditions for Issuance of Study Reports

Topic 8 - Generator Interconnection Agreement Insurance

Topic 9 -Interconnection Financial Security

Process Clarifications

Posting Clarification

Topic 10 - Forfeiture of Funds for Withdrawal During Downsizing Process

Topic 11 –TP Deliverability Option B Clarifications