

Stakeholder Comments Template

Subject: Modifications to the Small Generator Interconnection Procedures Issues Paper and Meeting

Submitted by	Company	Date Submitted
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This template was created to help stakeholders submit written comments on topics related to the April 1, 2010 Modifications to the Small Generator Interconnection Procedures Issue Paper and April 12, 2010 Small Generator Interconnection Procedures Stakeholder Meeting. Please submit comments and thoughts (in MS Word) to dkirrene@caiso.com no later than the close of business on April 27, 2010.

The ISO is interested in knowing the importance and urgency of the issues identified through this stakeholder process. The issues identified below are further described in the Issues Paper. Please rate the importance of each issue as high, medium or low by checking the check box. In addition, please identify the urgency for getting each of the identified issues resolved. Check the urgent check box for issues that should be resolved in a FERC filing this year. Check the not urgent check box if the issue could be resolved beyond year-end. The information provided will assist the ISO in determining the scope of this stakeholder effort.

Study Process Issues		
	Importance	Urgency
2.1.1 Time required for the SGIP study process	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.2 SGIP serial study process coordination with the studies under the large generation interconnection procedures (LGIP)	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.3 Avoiding delays caused by the increasing volume of SGIP projects	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.4 Detail and necessity of the feasibility study	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent

2.1.5 Interconnection request data requirements	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.6 Should the SGIP accommodate re-studies?	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.7 Availability of the current base case data for use by project developers	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.8 Delays and uncertainty in study results caused by projects that withdraw	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	NCPA provides no comment on Section 2.1 (Study Process) at this time.	
Solution Ideas:		
Deliverability Issues Related to Interconnecting Small Generation		
2.2.1 Should SGIP have an option for deliverability?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.2.2 Should there be an opportunity to have "partial deliverability"?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.2.3 Should there be a later opportunity to change deliverability status after generator is commercially operational?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.2.4 How would a change in policy affect existing generation and/or existing projects in the queue?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	Based on NCPA's current understanding of the proposed change to deliverability described in section 2.2 of the issue paper, NCPA believes that a Small Facility should have an ability, within the SGIP process, to choose an option for a deliverability study without having to move to the LGIP. The LGIP process can be expensive and lengthy (a multi-year process), and in most instances is not appropriate for the size of a Small Facility. NCPA is particularly concerned with how this element of the proposal may impact existing projects that are on-line and are in queue. NCPA believes that any existing project should not be impacted by this proposed change, and that this proposed change (if adopted) should be applied only on a prospective basis. Existing Small Facilities that currently provide Resource Adequacy Capacity should remain fully qualified to provide such service and be treated as deliverable. The result of this	

	stakeholder process should in no way be applied retroactively, resulting in the reclassification of existing projects as Energy Only.			
Solution Ideas:				
Issues relating to Cost Certainty				
2.3.1 Developers desire cost certainty	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.3.2 How to minimize the impacts caused by projects that drop out of the queue?	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.3.3 Accuracy of the per unit construction cost estimates	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.3.4 Effects of adding cost certainty measures to the overall SGIP timeline	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	NCPA provides no comment on Section 2.3 (Cost Certainty) at this time.			
Solution Ideas:				
Issues related to Eligibility Criteria				
2.4.1 LGIP projects broken up into multiple SGIP projects	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.4.2 Real vs. Speculative projects	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.4.3 Generation MW size	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.4.4 MW Increases to existing projects	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.4.5 Site Control	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	NCPA provides no comment on Section 2.4 (Eligibility Criteria) at this time.			
Solution Ideas:				
Issues related to application and study fees				
2.5.1 Appropriateness of amount	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	NCPA provides no comment on Section 2.5 (Application and Study Fees) at this time.			

Solution Ideas:			
Small Generator Interconnection Agreement Issues			
2.6.1 Pace of SGIA completion	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent	<input type="checkbox"/> not urgent
2.6.2 Detail of the SGIA	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent	<input type="checkbox"/> not urgent
Comments:	NCPA provides no comment on Section 2.6 (Small Generator Interconnection Agreement Issues) at this time.		
Solution Ideas:			
Miscellaneous SGIP tariff issues			
2.7.1 Detail of the SGIP tariff	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent	<input type="checkbox"/> not urgent
2.7.2 Clarity of SGIP tariff definitions	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent	<input type="checkbox"/> not urgent
Comments:	NCPA provides no comment on Section 2.7 (Miscellaneous SGIP Tariff Issues) at this time.		
Solution Ideas:			
Additional Issues that should be considered			
<i>Please include additional issues here.</i>	<input type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent	<input type="checkbox"/> not urgent
Comments:	No Comment.		
Solution Ideas:			

Do you have any additional comments that you would like to provide?