

## 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](mailto: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 checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" 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 checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.1.3 Avoiding delays caused by the increasing volume of SGIP projects	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" 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 checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.1.5 Interconnection	<input type="checkbox"/> high <input type="checkbox"/> medium <input checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent

request data requirements		
2.1.6 Should the SGIP accommodate re-studies?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" 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 checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.1.8 Delays and uncertainty in study results caused by projects that withdraw	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	2.1.2 – this should also include coordination with the WDATs	
Solution Ideas:	To save time, projects that are speculative should be weeded out first to save re-study time. This also includes the WDAT queues.	
<b>Deliverability Issues Related to Interconnecting Small Generation</b>		
2.2.1 Should SGIP have an option for deliverability?	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" 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 checked="" 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 checked="" 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 checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	Deliverability is a critical issue and needs to be resolved ASAP.	
Solution Ideas:	All SGIP projects currently in the queue should be able to opt for deliverability. In order not to delay the SGIP process perhaps the Deliverability Study could be done: (1) immediately after the SIS in cases where it is straightforward; and (2) after the SGIA when not	
<b>Issues relating to Cost Certainty</b>		
2.3.1 Developers desire cost certainty	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" 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 checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent

2.3.3 Accuracy of the per unit construction cost estimates	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" 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 checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:	It would be useful for all utilities to post on their web-sites the unit costs for various equipment at the 69 and 115kV voltages.	
Solution Ideas:		
<b>Issues related to Eligibility Criteria</b>		
2.4.1 LGIP projects broken up into multiple SGIP projects	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.4.2 Real vs. Speculative projects	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
2.4.3 Generation MW size	<input type="checkbox"/> high <input type="checkbox"/> medium <input checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.4.4 MW Increases to existing projects	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.4.5 Site Control	<input type="checkbox"/> high <input type="checkbox"/> medium <input checked="" type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
Comments:	2.4.1 Need to have common eligibility criteria between the WDAT and SGIP processes	
Solution Ideas:		
<b>Issues related to application and study fees</b>		
2.5.1 Appropriateness of amount	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:		
Solution Ideas:	Raise the application deposit to \$20,000.	
<b>Small Generator Interconnection Agreement Issues</b>		
2.6.1 Pace of SGIA completion	<input type="checkbox"/> high <input checked="" type="checkbox"/> medium <input type="checkbox"/> low	<input type="checkbox"/> urgent <input checked="" type="checkbox"/> not urgent
2.6.2 Detail of the SGIA	<input checked="" type="checkbox"/> high <input type="checkbox"/> medium <input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent <input type="checkbox"/> not urgent
Comments:		
Solution Ideas:		

<b>Miscellaneous SGIP tariff issues</b>						
2.7.1 Detail of the SGIP tariff	<input type="checkbox"/> high	<input checked="" type="checkbox"/> medium	<input type="checkbox"/> low	<input type="checkbox"/> urgent	<input checked="" type="checkbox"/> not urgent	
2.7.2 Clarity of SGIP tariff definitions	<input checked="" type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent	<input type="checkbox"/> not urgent	
Comments:	Clear and equally applied policy between determination of Interconnection Facilities vs. Network Upgrades needs to be applied.					
Solution Ideas:						
<b>Additional Issues that should be considered</b>						
<i>SGIP/WDAT Eligibility</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/> high	<input type="checkbox"/> medium	<input type="checkbox"/> low	<input checked="" type="checkbox"/> urgent	<input type="checkbox"/> not urgent
Comments:	The major criteria for application eligibility (fees, multiple projects, etc) used by the CAISO and WDATs should be substantially the same.					
Solution Ideas:						

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

The original SGIP process was put in place to allow the expedited interconnection for smaller projects. A major objective in this process is to allow an expedited interconnection process for those projects which are able to achieve an early start date.

An avenue for expedited interconnects should exist for those projects that qualify (e.g. no network upgrades needed, expedited permitting schedules, etc). As such, the developer could opt for either an "expedited" or a "normal" interconnect process.

A nice job on the template!