

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the stakeholder initiative:

“2017 Expedited GIDAP Enhancements Straw Proposal”

Submit comments to InitiativeComments@CAISO.com

Comments are due Wednesday, September 13, 2017 by 5:00pm

The Issue Paper posted on July 21, 2017, the Revised Issue Paper posted on August 30, 2017, and the presentations discussed during the September 7, 2017 stakeholder meeting can be found at CAISO.com or at the following link:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/2017ExpeditedGIDAPEnhancements.aspx>

Please use this template to provide your written comments on the issue paper topics listed below and any additional comments that you wish to provide.

1. Do you support the Extended Parking straw proposal? And why?

Comments: [Terra Gen supports this initiative subject to removal of the GIA Tendering condition. The CAISO has recognized that procurement timing of the three major IOUs (PG&E, SCE, and SDG&E) is not in line with the TPP deliverability allocation and introducing a second-year parking option will better align the interconnection process with new project development and IOU procurement. This should lend itself to facilitating more in-state renewable generation coming on line but for the condition of “not tendering the GIA” will eliminate this option for some of the interconnection customers. Specifically, wind farm developments are facing the imminent phase out of

the Production Tax Credit (PTC) commencing in 2020. Therefore, given the minimum timeline for construction of the Participating TO's Interconnection Facilities is typically no less than 24 months, wind projects cannot afford to delay the GIA execution. Cluster 9 interconnection requests are expecting to execute the GIA sometime in Q3/Q4 of 2018. As the interconnection Parking Policy is being proposed, a renewable energy project would need to select Energy Only status in order to be tendered a GIA in a timely manner. This could prove disadvantageous in an IOU solicitation process. We believe that an Extend Parking timeline can be accommodated without any negative impact to the CAISO deliverability process while still providing the developer an option to move forward with a GIA. Keeping the GIA processes moving forward allows for timely development within the PTC phaseout window and allows the developer to still obtain Deliverability later in the process. We are requesting the CAISO kindly consider our request and allow the tendering of the GIA while projects park for deliverability allocation.]

2. Do you support the Interconnection Request (IR) Window & Validation Timelines Straw Proposal? And why?

Comments: [Terra Gen supports this initiative. Based on Clusters 9 and 10 experiences, this will significantly help the process. Terra Gen also suggests a uniform process across the three major IOUs of PG&E, SCE, and SDG&E. We provided similar supporting files in our Cluster 10 requests to the three IOUs. Some of the IOUs approved our requests quickly while others took some time to receives approvals.]