

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Interconnection Process Enhancements Scoping Proposal posted on April 8 and supplemented by the presentation discussed during the April 22 stakeholder web conference.

Submit comments to GIP@caiso.com

[Comments are due April 30, 2013 by 5:00pm](#)

The Scoping Proposal posted on April 8 may be found at:

<http://www.caiso.com/Documents/ScopingProposal-InterconnectionProcessEnhancements.pdf>

The presentation discussed during the April 22 stakeholder web conference may be found at:

http://www.caiso.com/Documents/Agenda-Presentation-ScopingProposal-InterconnectionProcessEnhancementsApr22_2013.pdf

Part 1

Please provide your feedback on the 12 topics initially proposed to be in scope in the April 8th Scoping Proposal by responding to the following:

1. *If you believe that one or more of these 12 topics should not be in scope, identify those and provide a detailed explanation of why –*

Future Downsizing – We do not oppose additional downsizing flexibility but it has been addressed and reasonable options are currently available. There are numerous other issues that are much more important. Solving other significant issues/problems with the interconnection procedures/processes is much more important than giving projects another bite of the downsizing apple. Also, any changes to existing Tariff downsizing provisions must also address the penalty (discrimination) this creates against projects that followed the rules in effect for their project.

2. If you believe that the description of a topic (i.e., one of the 12) is not accurate, provide your preferred description of the topic –

Wellhead is a strong supporter of the need for the interconnection process to have ways to address projects with unique circumstances (the Independent and Fast Track Processes). In fact, a Wellhead project was a driving motivation to developing the ISP. However, that project would probably not pass the ISP criteria today because of the fundamental flaw in the current interconnection process (assuming that all projects in the queue will come on line). It is difficult to envision how a project will ever be able to demonstrate independence (no impacts on other projects) in order to qualify for these accelerated study processes. That fundamental underlying problem needs to be addressed and resolved in a truly fair and non-discriminatory way to facilitate an effective/workable ISP.

There are a number of topics in the “identified 12” as well as in the bigger list of possible issues which seem to be appropriately categorized as “clarifications”, “consistency” or “unintended/unreasonable results” fixes to the interconnection processes. Wellhead believes it is important to make such changes to the Tariff but believes there are several other items on the list of 49 that are essentially clean-ups that should neither be highly controversial nor difficult to fix/implement. Identified topics that fit into this category (which should be a single item on the list) include the following topics, by number in the issue paper: 3, 6, 9, 10, 11, 12, 14, 17, 18, 20, and 49.

Part 2

Please select five topics of greatest importance to you from (i) the 49 topics included in the April 8th Scoping Proposal and (ii) any additional generation interconnection process related topics not already included in the 49 topics, and rank them in order of importance using the table provided below (a rank of “1” being most important). Note: Numerical rankings are informative but the detailed explanations you provide below the table will be critical for the ISO as we assess the scope of this initiative.

Top 5 topics selected by stakeholder

Topic No. (if one of the 49 topics; otherwise use N/A)	Topic Name (either the topic name used in the Scoping Proposal or, if a new topic provide your own name for the topic)	Rank
30	Inability to delay any shared network upgrade. The current procedures need clarification to allow the CAISO/utility to delay a shared upgrade when the upgrade is not needed until the last of the projects sharing in the upgrade comes on line. For example, assume	1

	the following: i) there are three 100 MW projects sharing in an upgrade; ii) the upgrade is not needed until all three projects come on line, and iii) two of the projects are under construction and one is still in the pre-construction phase and is taking longer than it expected. In this case, the CAISO/utility should be allowed to delay the shared upgrade to avoid expenditures on an upgrade that may never be needed. This should be a simple clarification and could be addressed as an element of topic #3	
13	Coordination with utility procurement efforts. Utility procurement is the primary reason why an interconnection is needed (to get an accurate understanding of the extent/cost of interconnecting a specific project) and it is ridiculous to not fully account for the procurement process in the interconnection procedures.	2
4	Improve Independent Study Process. When the interconnection study process takes more than twice as long as it takes a developer to permit and construct a project something is clearly wrong. The ISP is needed, it needs to be usable (as discussed above), and it MUST NOT be limited to EO service for Option A projects which require FCDS as part of a utility procurement process.	3
22, 23, 31, 32, 38, 39	Deposit/security forfeiture and refunds. We have no problem with developers having to demonstrate they are real and have the financial wherewithal to take a project to completion (and have significant skin in the game) but because the studies assume all projects in the queue get built and because cost estimating by the PTO's is VERY conservative (i.e. high), the security amount clearly can be excessive. Forfeiture is thus punitive and does not reasonably correspond with any damage or harm caused.	4
19	Project parking – the procurement process can take several years and there is good reason why a project may need to park several years. Additionally, until a project knows (i.e. is beginning construction) it will reach commercial operation, it should not be able to hold FCDS that is needed by another project that is ready to begin construction.	5

Detailed explanations

1. *Provide a detailed description of each topic. Use the topic description in the Scoping Proposal if you believe it is an accurate description of the issue; otherwise provide your preferred description of the topic. For new topics, provide your own detailed description.*

[See comments provided with each topic](#)

2. *Provide a detailed explanation of the rationale for your selection of these five topics and your rankings*

These items all represent significant flaws/shortcomings with the existing interconnection process that are causing unnecessary costs and /or delays in otherwise low cost projects. The result is more expensive solutions to the detriment of consumers.

3. *Identify which of the 12 topics initially proposed to be in scope you recommend your selected topics should replace*

If necessary, Downsizing and Fast Track (it can follow ISP reform) should be deferred to accommodate these topics.