

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Issues Paper posted on January 17, 2018.

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due February 7, 2018 by 5:00pm**

The issue paper posted on January 17, 2018 and the presentation discussed during the January 24, 2017 stakeholder meeting can be found on the CAISO webpage at the following link:  
<http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>

Please use this template to provide your written comments on the Issue Paper topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Issue Paper for convenience.

### 4. Deliverability

#### 4.1 Transmission Plan Deliverability Allocation

Wellhead believes the TPD process is fine as is. No change is needed.

#### 4.2 Balance Sheet Financing

The CAISO should continue to allow balance sheet financing. If the CAISO prohibits balance sheet financing, that might force developers to unnecessarily or prematurely engage project lenders.

#### 4.3 Participating in the Annual Full Capacity Deliverability Option

Additional qualifying criteria are not necessary. The current qualifying criteria are adequate.

#### 4.4 Change in Deliverability Status to Energy Only

No comment.

#### 4.5 Energy Only Projects' Ability to Re-enter the CAISO Queue for Full Capacity

Wellhead supports the ability for projects to re-enter the CAISO queue for FCDS.

#### 4.6 Options to Transfer Deliverability

No comment.

#### 4.7 Transparency on Availability of Deliverability

No comment.

#### 4.8 Commercial Viability Criteria – Continuous Compliance Obligation

No comment.

#### 4.9 Interim Deliverability Status

No comment.

#### 4.10 Effective Load Carrying Capacity

Revised ELCC methodologies should result in NQCs that closely follow resource attributes and whether resource deliveries are likely to coincide with CAISO peak needs.

#### 4.11 Cancellation or Delay of CAISO Approved Transmission Projects

No comment.

### 5. Energy Storage

#### 5.1 Distributed Energy Resources

No comment.

#### 5.2 Replacing Entire Existing Generator Facilities with Storage

No comment.

#### 5.3 Deliverability Assessment for Energy Storage Facilities

No comment.

### 6. Generator Interconnection Agreements

#### 6.1 Suspension Notice

No comment.

6.2 Affected Participating Transmission Owner

No comment.

6.3 Clarify New Resource Interconnection Requirements

No comment.

6.4 Ride-through Requirements for Inverter based Generation

No comment.

6.5 Affected System Options

No comment.

6.6 Modeling Data Requirements

No comment.

## 7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

No comment.

7.2 ITCC for Non-cash Reimbursement Network Upgrade Costs

No comment.

7.3 Financial Security Postings and Non-Refundable Amounts

No comment.

7.4 Queue Clearing Measures

No comment.

7.5 Shared SANU and SANU Posting Criteria Issues

No comment.

7.6 Clarification on Posting Requirements for PTOs

No comment.

7.7 Reliability Network Upgrade Reimbursement Cap

No comment.

7.8 Reimbursement for Network Upgrades

No comment.

## 8. Interconnection Request

### 8.1 Study Agreement

Wellhead agrees. This is an improvement to the IR process.

### 8.2 Revisions to Queue Entry Requirements

No comment.

### 8.3 Master Planned Projects (Open Ended and Serial Projects)

No comment.

### 8.4 Project Name Publication

No comment.

### 8.5 Interconnection Request Application Enhancements

No comment.

### 8.6 FERC Order No. 877

No comment.

## 9. Modifications

### 9.1 Timing of Technology Changes

Wellhead proposes no program changes at this time.

### 9.2 Commercial Viability – PPA Path Clarification

No comment.

### 9.3 PPA Transparency

No comment.

### 9.4 Increase Repowering and Serial Re-Study Deposit

No comment.

### 9.5 Clarify Measure for Modifications After COD

No comment.

### 9.6 Short Circuit Duty Contribution Criteria for Repower Projects

No comment.

### 9.7 Material Modification for Parked Projects

Interconnection Customers should be able to submit a Material Modification while parked. Without this flexibility, developers would be required to have perfect foresight (in a very dynamic and evolving market) prior to being parked.

## 10. Additional Comments