

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 Draft Final Proposal paper posted on September 4, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due September 24, 2018 by 5:00pm

The Draft Final Proposal posted on September 4, 2018 and the presentation to be discussed during the September 17, 2018 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 Draft Final Proposal topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Draft Final Proposal paper for convenience.

6. Generator Interconnection Agreements

6.2 Affected Participating Transmission Owner

CalWEA is extremely disappointed that CAISO staff has sided with PTOs in rejecting the largely consistent proposals by the resource development industries to introduce multiple-part (four or more) GIAs when Affected PTOs are identified in interconnection studies. Instead, staff proposes to continue with the very inefficient and convoluted separate interconnection agreements with individual PTOs. We do intend to raise this objection directly to the CAISO board.

6.4 Ride-through Requirements for Inverter based Generation

CalWEA is completely aligned with the underlying CAISO objectives to address the ride-through requirements for the inverter-based generation. And we are encouraged by CAISO's effort in educating the stakeholders and addressing the issues via technical workshops. We believe, however, that there should be no rush to a solution in this area unless the industry is completely on board with the proposed requirements. CalWEA also wants to emphasize that any standards or guidelines developed as part of this effort should apply to all inverter-based generation throughout the CAISO service territory regardless of the voltage level at the point of interconnection.

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

CalWEA has no objection to CAISO proposal in this area.

7.7 Reliability Network Upgrade Reimbursement Cap

CalWEA supports CAISO's proposal to introduce an escalation factor to adjust the RNU reimbursement cap. We also recommend that the same escalation factor applied by each PTO for estimating the future escalated cost of RNUs to be applied to the RNU reimbursement cap for that PTO.

10. Additional Comments

CalWEA wishes to recommend the following straightforward changes in the new definitions proposed by the CAISO in its draft final IPE-2018 proposal:

- The name "Interconnection Service Upgrades" should be changed to read: "**Interconnection Service Network Upgrades.**" We consider this change to be critical as we do not want the network designation of these upgrades to be lost due to an incomplete naming convention.
- The name "Directly Assigned Network Upgrade" is typically used in other jurisdictions to refer to what CAISO wants to term "Interconnection Service [Network] Upgrades." In order to avoid confusion for interconnection customers, we recommend this name to be changed to simply

say: “Assigned Network Upgrades.” For example, LDNUs identified as part of project interconnection studies should be referred to “Assigned Local Delivery Network Upgrades.”