

Sent on behalf of PARS Energy

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Hello Joanne,

I would like to submit a topic on compliance with FERC Order 827. There are two issues:

First, it appears that CAISO is following a different path on compliance with Order 827 than PG&E, SCE and SDG&E. The issue is whether compliance is needed at the submission of interconnection application or after issuing the Phase I or Phase II Reports in the Cluster process

Second, There is a need to develop a standardized methodology and test on reactive sufficiency determination to ensure the CAISO and all its members are following the same calculation process. This is completely missing at this time.

Please feel free to contact me if you have any questions.

Regards,

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