

## 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](mailto: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

### 6.4 Ride-through Requirements for Inverter based Generation

- 1) For inverters overvoltage criteria, SDGE believe that it should match the IRPTF Guideline, to avoid the possibility of confusion. The present range of 1.1 to 1.2 are RMS values at POI. They need to change either to peak values at the terminal of the inverters, like 2.0 per unit for less than 1.6 ms or something equivalent in RMS values as CAISO expressed more interest in doing that
- 2) For PMV event recording, SDG&E thinks that CAISO should define a frequency threshold like 59.9 Hz for major frequency events. Any frequency events below this threshold should automatically trigger recording of at least 1 second before to 30 second after the event. The recorded data has to be submitted to the Planning Coordinator (usually CAISO and one of the PTOs) within 10 calendar days.

## **7. Interconnection Financial Security and Cost Responsibility**

### 7.1 Maximum Cost Responsibility for NUs and Potential NUs

### 7.7 Reliability Network Upgrade Reimbursement Cap

## **10. Additional Comments**