

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Bonnie Blair <a href="mailto:bblair@thompsoncoburn.com">bblair@thompsoncoburn.com</a> 202.585.6905	<b><u>Supplemental Comments – See Response to Question 10</u></b>	<b><u>June 25, 2018</u></b>

Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Straw Proposal posted on May 9, 2018.

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

**Comments are due June 4, 2018 by 5:00pm**

The straw proposal posted on May 9, 2018 and the presentation discussed during the May 21, 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
- 4.2 Balance Sheet Financing
- 4.3 Participating in the Annual Full Capacity Deliverability Option
- 4.4 Change in Deliverability Status to Energy Only
- 4.5 Energy Only Projects' Ability to Re-enter the CAISO Queue for Full Capacity
- 4.6 Options to Transfer Deliverability

## **5. Energy Storage**

- 5.2 Replacing Entire Existing Generator Facilities with Storage

## **6. Generator Interconnection Agreements**

- 6.1 Suspension Notice
- 6.2 Affected Participating Transmission Owner
- 6.3 Clarify New Resource Interconnection Requirements
- 6.4 Ride-through Requirements for Inverter based Generation

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

- 7.1 Maximum Cost Responsibility for NUs and Potential NUs
- 7.5 Shared SANU and SANU Posting Criteria Issues
- 7.6 Clarification on Posting Requirements for PTOs – **Final Proposal**
- 7.7 Reliability Network Upgrade Reimbursement Cap
- 7.9 Impact of Modifications on Initial Financial Security Posting

## **8. Interconnection Request**

- 8.1 Study Agreement – **Final Proposal**
- 8.4 Project Name Publication

## **9. Modifications**

- 9.1 Timing of Technology Changes
- 9.2 Commercial Viability – PPA Path Clarification
- 9.3 PPA Transparency – **Final Proposal**
- 9.4 Increase Repowering and Serial Re-Study Deposit– **Final Proposal**

- 9.5 Clarify Measure for Modifications After COD – Final Proposal
- 9.6 Short Circuit Duty Contribution Criteria for Repower Projects

## 10. Additional Comments

Section 6.6: The comments set forth below supplement the comments previously provided to the CAISO related to Section 6.6 of the Straw Proposal, in which the CAISO discusses its proposal to require, pursuant to Section 24.8 of the CAISO tariff, certain modeling information from Participating Generators through revisions to the Business Practice Manual (“BPM”) for the Transmission Planning Process (“TPP”). The proposed model and verification requirements are contained in a new Section 10 of the TPP BPM (see Proposed Revision Request No. 1067) and were posted for industry comment through June 19<sup>th</sup>.

The Six Cities identified a number of concerns with the proposed BPM revisions and provided the CAISO with comments describing their concerns as part of the BPM Change Management Process. The Six Cities’ comments are attached to these Supplemental Comments as Attachment A.

Having reviewed the proposed BPM revisions, including the proposed modeling data templates and the CAISO’s initial categorization of Participating Generators (the “Category” assigned to the Participating Generator determines the extent of and deadline for the data reporting and verification requirements), the Six Cities observe that the proposed revisions to the TPP BPM are more specific and detailed than the tariff provisions that the CAISO cites as authority for imposing the new requirements. Because the proposed changes to the TPP BPM arguably go beyond the scope of the current tariff, the CAISO’s proposal to require Participating Generators to submit test reports and modeling data should remain an open issue in this initiative, which should include consideration of whether the CAISO tariff should be modified to reflect the applicable data requirements.

While the Six Cities support the CAISO’s efforts to ensure that its models are accurate, consistent with their comments on the draft BPM revisions, the CAISO’s new data submittal and verification requirements should be appropriately tailored to the size and configuration of the various categories of Participating Generators, particularly given the anticipated cost associated with performing the proposed validation activities. The requirements and submittal process should be clear, and there should be reasonable deadlines to provide the required information to the CAISO.

June 19, 2018

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,  
PASADENA, AND RIVERSIDE, CALIFORNIA ON PROPOSED REVISION  
REQUEST 1067 - GENERATOR MODELING DATA REQUIREMENT**

In accordance with the Business Practice Manual (“BPM”) Change Management Process, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the “Six Cities”) provide their comments on Proposed Revision Request (“PRR”) 1067, titled “Generator Modeling Data Requirement.” Through PRR 1067, the CAISO proposes to include in the Transmission Planning Process (“TPP”) BPM a new Section 10, which sets forth requirements for modeling data to be provided to the CAISO by Participating Generators. The Section provides the data to be included and the format, procedures, and schedule for submitting the data. The Six Cities have identified several concerns with regard to proposed Section 10.

- (1) The CAISO has not identified a specific reliability need for modeling data from Category 2 generating resources. Section 10.1.1 of the TPP BPM defines Category 2 generators as “Participating generators connected to facilities 60 kV and above, and not covered in category 1.” Thus, Category 2 generators are not connected to the Bulk Electric System (“BES”), but the CAISO nevertheless is proposing that these generators submit test reports and modeling data. (*See* Section 10.1.3.) Because these generators are not connected to the BES, it is not clear for what reason the CAISO would need such extensive information. Further, the CAISO’s request for test reports and modeling data from Category 2 generators appears to go beyond the scope of information required from these resources by NERC Reliability Standards.
- (2) Given that Category 2 generators are not connected to the BES, in the event that the TPP BPM is modified to require from Category 2 Participating Generators modeling and testing data that meets WECC requirements, the CAISO should accept the most recent WECC model data test results for modeling purposes. The generator would only have to be re-tested pursuant to any equipment modifications since the last test. This would provide the CAISO with the requisite modeling data without placing an undue burden on generator operators.
- (3) The penalty provisions pursuant to Section 10 of the TPP BPM are unreasonable. A \$500/day sanction for late submission or inadvertent submission of inaccurate information is unreasonably high. Additionally, the CAISO proposes to penalize not the Participating Generator, who is responsible for supplying the requested modeling data under the proposed procedures, but the Scheduling Coordinator. (*See* Section 10, Overview; and Section 10.4.3). The Scheduling Coordinator could be a third party and may have no control over whether the Participating Generator submits accurate information or any information at all. Any penalties the CAISO assesses for failure to comply should focus on the entity responsible for providing the test reports and model data, rather than the Scheduling Coordinator.
- (4) With regard to the Generator Data Templates posted by the CAISO, Section 10.3 of the proposed TPP BPM provides that the CAISO will provide Participating Generators with

request letters for each unit, accompanied by completed Generator Data Templates reflecting the information that the CAISO and the relevant Participating TO currently have on file for the unit(s). The Six Cities urge the CAISO to provide this information to Participating Generators as promptly as possible. Without knowledge of the scope of information that the CAISO will supply versus the amount of information the Participating Generator is required to supply, it is difficult to assess the magnitude of the burden imposed by the requirement to provide a populated Generator Data Template.

- (5) Section 10 does not specify the frequency of which it will require test reports and modeling data. The Overview section states that CAISO Tariff Section 24.8.2 requires “Participating Generators [to] provide the CAISO on an annual or periodic basis in accordance with the schedule, procedures and in the form required by the Business Practice Manual any information and data reasonably required by the CAISO to perform the Transmission Planning Process. . . ,” but it does not go further in explaining whether the information is required annually or based on some other time period.
- (6) The proposed deadlines, particularly for Category 2 resources, may be inadequate. The Six Cities understand that Participating Generators may need to engage outside vendors in order to perform the model verification and testing required under the proposed TPP BPM provisions, and there are a limited number of vendors with the necessary capabilities and equipment. If the CAISO proceeds with the testing and verification requirements as proposed, it is possible that a large number of resources classified under Category 2 will need to have this testing and verification completed in advance of the 2021 deadlines. It may not be feasible for all Category 2 Participating Generators to schedule testing with a finite pool of vendors in the limited time allotted.
- (7) The CAISO’s proposed testing and validation requirements do not account for the cost to perform the testing and validation. The Six Cities understand that the cost to complete the activities specified in the proposed TPP BPM provision may exceed \$8,000-\$10,000 per unit, separate and apart from any costs associated with removal of the unit(s) from service. Given the limited discussion of the need for this information from Category 2 resources, it is not clear that these costs are justified.
- (8) The CAISO and SCE have previously developed a “Joint Transmission Planning Base Case Preparation Process” pursuant to NERC Reliability Standard MOD-032-1. How will this document interrelate with the proposed requirements of the TPP BPM?
- (9) The proposed revisions to the TPP BPM are far more specific and detailed than the Tariff provisions that the CAISO cites as authority for imposing Section 10’s requirements. Because the proposed changes to the TPP BPM arguably go beyond the scope of the current Tariff, the CAISO’s proposal to require Participating Generators to submit test reports and modeling data should remain an issue for discussion in the ongoing stakeholder initiative on 2018 Interconnection Process Enhancements. This initiative,

which was the catalyst for the proposed revisions in PRR 1067, provides a broader forum for addressing the CAISO's proposed requirements.

Submitted by,

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