

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 Revised Straw Proposal posted on July 10, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due July 31, 2018 by 5:00pm

The straw proposal posted on July 10, 2018 and the presentation discussed during the July 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 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, 4.2, 4.3, 4.5 and 9.2 Transmission Plan Deliverability Allocation (combined topics)

a. Allocation Ranking Groups (one through seven)

No comment.

b. Specific Topics:

i. Overall TPD Allocation Process

No comment.

ii. Elimination of Balance sheet financing terminology

No comment.

iii. Elimination of Annual Full Capacity Deliverability Option

No comment.

iv. Energy only projects' ability to re-enter the CAISO Queue for Full Capacity

No comment.

v. Commercial Viability Criteria (PPA Clarification)

No comment.

4.4 Change in Deliverability Status to Energy Only

No comment.

4.6 Options to “Transfer” Deliverability

No comment.

5. Energy Storage

5.2 Replacing Entire Existing Generator Facilities with Storage

No comment.

6. Generator Interconnection Agreements

6.1 Suspension Notice

There are many reasons for suspension, including, but not limited to, litigation, changes in law, etc., that will not have known completion dates. It would be unfair to make a project give dates for circumstances they cannot foresee. Impact on mitigation should be limited to projects that are responsible for Deliverability Network Upgrades.

6.2 Affected Participating Transmission Owner

No comment.

6.4 Ride-through Requirements for Inverter based Generation

No comment.

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

The CAISO should remove the Contingent Network Upgrades from consideration because Contingent Network Upgrades represent a contingent liability that may cause projects to become non-financeable.

7.3 Eliminate Conditions for Partial IFS Recovery Upon Withdrawal

No comment.

7.5 Shared SANU and SANU Posting Criteria Issues

No comment.

7.7 Reliability Network Upgrade Reimbursement Cap

Wellhead supports Option 3.

8. Interconnection Request

8.4 Project Name Publication

No comment.

9. Modifications

9.1 Timing of Technology Changes

No comment.

10. Additional Comments