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**RE: TOPICS FOR INCLUSION IN THE CAISO'S GENERATOR
INTERCONNECTION PROCESS ENHANCEMENT INITIATIVE**

Diversified Energy Regulatory Consulting LLC ("DERC") appreciates the opportunity to provide input on the topics that should be covered as part of the California ISO's ("CAISO's") generator interconnection process enhancement initiative. DERC applauds the CAISO's commitment to continue to improve the generator interconnection process.

DERC's comments will focus on the increasing role of distributed energy resources on California's energy landscape, and the likelihood that distributed energy resources will intersect and have an impact on the wholesale electric market. With the increasing penetration of distributed energy resources, DERC suggests that the CAISO's generator interconnection initiative also includes a discussion of the role of distributed energy resources in the generator interconnection process.

To that end, DERC suggests that the following topics be discussed as part of this initiative:

- With regard to distributed generation and other distributed energy resources, what visibility does the CAISO have insofar as the interconnection of these resources to the grid, and the ability of those resource, now or in the future to provide services to the grid?
- What are the jurisdictional boundaries between the ISO and distribution companies with regard to distributed energy resources providing multiple services at the distribution and possibly at the ISO level?
- As it pertains to the services that distributed energy resources may be able to provide to the grid, how are these resources prioritized, controlled or dispatched by the ISO relative to conventional generation?
- To the extent that distributed energy resources are able to inject energy on the grid, what are the safety priorities or requirements as it relates to service personnel working on the system? What role if any, should the ISO have in terms of ensuring the safety of service personnel?

DERC appreciates the opportunity to provide these suggested topics for discussion as part of a continuous process improvement initiative, and looks forward to participation in this initiative.

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