

## 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

## 7. Interconnection Financial Security and Cost Responsibility

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

Intersect Power disagrees with the CAISO’s proposal to establish the Maximum Cost Responsibility (“MCR”) as a combination of Direct Assigned Network Upgrades (“DANUs”) and Potential Network Upgrades (“PNUs”). Under this proposal, if PNUs are removed or converted to Precursor Network Upgrades (“PreNUs”), the headroom created in the MCR can be utilized to increase the costs of DANUs. This has the potential of unfairly impacting projects with a larger share of PNUs. If the CAISO/PTOs are seeking additional cost contingency for DANUs, the contingency should be uniformly applied to all projects, rather than as a result of unrelated upgrade attrition. To rectify this issue, an MCR should be established for DANUs separately from PNUs. Additionally, Intersect Power would like to highlight that the use of MCR headroom for DANU cost increases is counter to the CAISO’s response to SCE comments in the Straw Proposal issued May 9, 2018, as provided below:

“The CAISO does not agree with SCE that the maximum cost responsibility should not be adjusted when a potential network upgrade is no longer needed. Section 7.4.3(i) of Appendix DD allows for the adjustment of the maximum cost responsibility as part of the reassessment process. The CAISO believes that an interconnection customer should not be penalized for projects in a prior cluster delaying the signing of their GIA. Once a project in a prior cluster signs its GIA then any projects with a potential network upgrade from that project should have their maximum cost responsibility reduced by the amount of the potential network upgrade. The CAISO believes it is important to provide as much visibility into the type of network upgrades the interconnection customer will be responsible for. By allowing “headroom” related to a potential network upgrade in the maximum cost responsibility, the interconnection customer is at higher

risk for paying for more costs in the reassessment cost reallocation process than interconnection customers without a potential network upgrade.”

## 7.7 Reliability Network Upgrade Reimbursement Cap

# 10. Additional Comments