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)

b. Specific Topics:

i. Overall TPD Allocation Process

ii. Elimination of Balance sheet financing terminology

iii. Elimination of Annual Full Capacity Deliverability Option

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

v. Commercial Viability Criteria (PPA Clarification)

4.4 Change in Deliverability Status to Energy Only

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

6.4 Ride-through Requirements for Inverter based Generation

To the comment regarding the elimination of the trip due to PLL or loss of synchronism. We believe that retaining that trip is important. Removing the PLL trip will dramatically limit the control the inverter has and we believe that having control and getting offline when there is no 3phase system anymore is important. We propose a ride through either with or without reduced current injection or momentary cessation with current resumption within 500ms (assuming no loss of synch). If the ride through is long enough that inverters lose synch, then re-synch and resumption of current injection may take up to 1.5s – ramp rates should be discussed as this is most likely an unstable system and different than a LVRT

event. We propose a 15 degree phase shift and a 150ms ride through prior to tripping offline as a discussion point.

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

7.3 Eliminate Conditions for Partial IFS Recovery Upon Withdrawal

7.5 Shared SANU and SANU Posting Criteria Issues

7.7 Reliability Network Upgrade Reimbursement Cap

8. Interconnection Request

8.4 Project Name Publication

9. Modifications

9.1 Timing of Technology Changes

10. Additional Comments