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FIT Coalition Call to Action | June 24, 2010

Hello FIT Coalition Community:

The California Independent System Operator (CAISO) is on the verge of undermining the Wholesale Distributed Generation (WDG) market segment, which is comprised of 20 megawatt (MW) and under projects that are interconnected to the distribution grid.

CAISO has proposed eliminating the Small Generator Interconnection Procedure (SGIP), which is the streamlined interconnection process for 20 MW and below energy projects that is mandated by the Federal Energy Regulatory Commission (FERC).

The FIT Coalition urges all developers pursuing WDG projects in California to get involved to **help ensure that CAISO does not eliminate SGIP**. Please **reply to this email if the FIT Coalition can count on your support**.

On the surface, CAISO has initiated reform because the SGIP process has been taking longer than the 9-month timeframe that is intended to be its maximum duration. Rather than simply fixing the SGIP process, however, CAISO is proposing to eliminate SGIP by processing all projects through a process akin to the Large Generator Interconnection Procedure (LGIP), which would add a significant delay to the interconnection process for projects sized 20 MW and under.

The proposed process would take up to 2 years - and perhaps even longer. This would significantly undermine what is currently a MAJOR benefit of 20 MW and below renewables: a streamlined interconnection procedure. CAISO claims that it would maintain a so-called Fast Track process for 2 MW and under projects, but considering that the Fast Track process has virtually unattainable requirements, this is a useless concession even for the sliver of tiny wholesale projects that it is intended to help.

Additionally, the FIT Coalition is extremely concerned that the Investor-Owned Utilities (IOUs) would attempt to reflect any SGIP changes in their Wholesale Distribution Access Tariffs (WDATs), thereby creating HUGE impediments for WDG. While the WDATs are supposedly not being discussed in this CAISO proceeding, the IOUs historically adopt changes made in SGIP into their WDATs. As such, CAISO's proposed elimination of SGIP would very likely lead to de facto reforms that make the WDATs equivalent to the LGIP (ie, all WDG projects would essentially be subject to LGIP, which would be a HUGE impediment to WDG).

CAISO needs to fix SGIP rather than eliminate it. The FIT Coalition urges all developers pursuing WDG projects in California to get involved to help ensure that CAISO does not eliminate SGIP. **Please reply to this email if the**

About The FIT Coalition

The FIT Coalition is a leading force in replicating Feed-In Tariffs and other global renewable energy best-practices throughout the United States. The FIT Coalition's mission is to identify and advocate for policies that will accelerate the deployment of cost-effective renewable energy in the United States. The FIT Coalition believes the right policies will result in a timely transition to renewable energy while yielding tremendous economic benefits, including new job creation, increased tax revenue, and the establishment of an economic foundation that will drive growth for decades. The FIT Coalition is active at the national, state, and municipal levels. To learn more, visit www.FITCoalition.com.

Support the FIT Coalition

The FIT Coalition is actively seeking financial backing in order to strengthen our efforts at both the state and federal level. If you or your organization is interested in supporting the FIT Coalition, please contact us at development@fitcoalition.com. Additionally, we welcome invitations to any forums or events where we can promote the benefits of Feed-In Tariffs to new audiences.

FIT Coalition can count on your support.

This CAISO proceeding is open to the public, and here is the calendar of related events:

- June 25: Working Group meeting #3
- July 8: Working Group meeting #4
- July 12: Draft Final Proposal posted to ISO website
- July 20: Stakeholder meeting to discuss Draft Final Proposal
- July 27: Written stakeholder comments due on Draft Final Proposal
- Weeks of August 2 & 9:
 - Additional stakeholder engagement
- Aug 13: Stakeholder Process Complete
- Sep 9-10: Board of Governors meeting – approval of modified SGIP requested
- Sept 13: Draft tariff language posted
- Sept 20: Written stakeholder comments on draft tariff language due
- Sept 27: Stakeholder meeting to discuss draft tariff language
- Oct 12: Tariff language filed at FERC
- Dec 20: Anticipated FERC Order Issued

Additional details, including location and participation details, can be found at this CAISO weblink: <http://www.caiso.com/27a2/27a2f34fa360.pdf>

The FIT Coalition has submitted comments on this proceeding, and these can be found here: <http://www.fitcoalition.com/news-and-events/>

Again, the FIT Coalition hopes to have your support; please let us know by replying to this email.

Sincerely,

Ted Ko, Associate Executive Director
FIT Coalition

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