<u>Stakeholder Comments Template</u>

Deliverability for Distributed Generation

Draft Final Proposal

Submitted by	Company	Date Submitted
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We appreciate the efforts made by the ISO to address the issue of Deliverability for Distributed Generation and believe that the ISO has laid out a solid strategy to contribute to California's efforts to increase the share of renewable resource production in the state's annual consumption of electricity.

Deliverability Study Methodology

We appreciate the ISO's decision to publish information on nodes where the ISO has found to be deliverable a larger MW amount than was specified in the TPP base portfolio. However, we remain unclear as to why the ISO feels that the maximum possible allocation for a cycle should be determined by the TPP base portfolio amount.

To us, it seems logical that the goal should be to allocate as much Deliverability to DG as possible, assuming no other parties are disadvantaged in the process. Is the ISO determined to adhere to the TPP base portfolio for reasons of process or is there a concern that any divergence from the TPP base portfolio will disadvantage other parties? Since allocations under this program only apply to excess available Deliverability not sought through any other study process, there will be no impact on any prior queued applicants. We ask the CAISO to further explain the rationale for limiting maximum allocation to the base case estimates when this conflicts with developments in the period following creation of the base case, and to explain why the position proposed below is not feasible:

We propose that any node that has already exceeded the target levels of DG (actively deployed, assigned a PPA, Interconnection Agreement, or under interconnection study) should have the base case target level automatically raised to accommodate the <u>actual planned deployment in that location.</u>

DG deliverability as an attribute of a DG resource

The ISO states that it will look to the responsible LRA to ensure that each DG project that was assigned deliverability is making satisfactory progress toward commercial operation.

We ask for more clarification on this issue. Does the ISO intend to provide guidance to the LRAs on this issue or will the LRAs have complete leeway to determine the criteria? In terms of the CPUC, will there be a process to determine is meant by "satisfactory process"?

We recommend a firm time limit to ensure that available Deliverability is assigned to truly active projects, allowing others to seek new assignment when they are ready. We recommend expiration of assigned Deliverability if COD is not achieved within a period not to exceed 36 months, including any possible extensions. We recommend interim progress review be required at a shorter interval not to exceed 18 months.

Unused or unassigned DG deliverability

We strongly support the decision by the ISO to preserve the allocated deliverability at each node in subsequent GIP studies, even if the amount of allocated deliverability was not fully assigned by LRAs to specific DG projects.

We also recognize the benefit of the allocated deliverability reverting at some point and would therefore recommend that the deliverability allocations expire just prior to the second subsequent study and allocation cycle (approximately 18 months), and be reallocated as usual in that round.