

PG&E Comments on proposed Changes to CAISO BPM

Re: BPM# 1605, "Interconnection process enhancements 2023 updates and clarifications"

From: David Corzilius, Contract Specialist, Principal.

Date: 1/9/25

Page:	Section:	Comment(s):
26	3.12	<p>CAISO updates state the new Implementation Deposit will be used "to pay for prudent costs incurred by the CAISO or third parties at the direction of the CAISO to manage the Interconnection Request between GIA execution and the Commercial Operation Date, including without limitation executing GIA amendments, modeling and testing for synchronization, preparing for metering and telemetry, and incorporating the Generating Units into the CAISO Markets."</p> <p>The next paragraph suggests the PTOs are still able to invoice for actual costs incurred but (1) those invoices may need to be submitted to the CAISO instead of the customer and (2) suggests those invoices will be paid from that deposit.</p> <p>Is this payment from the deposit in addition to the PTOs charging the IC for the interconnection work and equipment? If yes, what are the criteria / cost categories that would qualify for the PTOs to submit an invoice to the CAISO to receive reimbursement from this deposit?</p> <p>It is unclear from this section how this Implementation Deposit will function in relation to the PTOs own billing for implementation work performed to interconnect these customers. To avoid any confusion about how the CAISO and PTO invoicing processes will coordinate and/or be different, PG&E requests this to be clarified in this section also.</p> <p>PG&E recommends that this section is updated to reflect that there are only single-phase studies going forward, and that Cluster 14 projects are done with phase two studies.</p>
	6.1.2	<p>This Section requests Submitted Between the Phase I and Phase II Interconnection Studies.</p> <p>Since there are only single-phase studies going forward, and cluster 14 projects are done with phase two studies, PG&E recommends updating this section to reflect the phase two studies.</p>
	6.1.3	<p>This Section requests Submitted After Phase II Interconnection Studies</p> <p>PG&E Comment: This is applicable only to Cluster 14 and prior projects.</p>
40	6.1.5.2	<p>There are no redlines in this section to indicate what changes are being proposed. PG&E requests clarification on the changes being proposed in this section.</p>
46	6.2.1.4	No comments.
49	6.4.1	No comments.
50	6.4.2	No comments.
54	6.4.4	No comments.
	6.4.7.	<p>Section about facilities reassessment</p> <p>PG&E Comment: Adjustments to Maximum Cost Responsibility and Maximum Cost Exposure is usually made only during Phase 2 Cluster study and Reassessment. Going forward, this would happen only during restudy/reassessment, so this section needs to be updated. Also, it is unclear how a modification can be non-material if it requires additional network upgrades.</p>
59	6.5.3	No comments.
60	6.5.4	No comments.
65	6.5.5	No comments.
69	6.5.10	No comments.
	6.1.2 of BPM/ 6.7.2.2 of	<p>In section 6.1.2: "Section 6.7.2.2 of the Appendix DD allows an Interconnection Customer to modify its Point of Interconnection within ten days of the Phase I Study Results Meeting without an MMA."</p>

	the Appendix DD	PG&E Comment: This is not applicable anymore.
75	8	No comments.