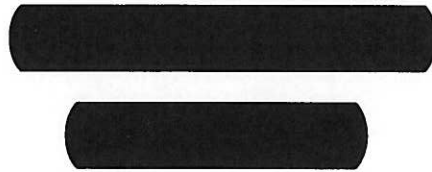


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# **Addendum to Appendix A – WDT1203**

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## **Addendum #1**

### **Cluster 7 Phase II Final Report**

**December 24, 2015**

This study has been completed in coordination with the California Independent System Operator Corporation (CAISO) per CAISO Tariff Appendix DD Generator Interconnection and Deliverability Allocation Procedures (GIDAP)

Project No.		No	Date	Document Title	Description of Document
WDT1203	[REDACTED]	2	12/24/2015	Addendum #1 to Queue Cluster 7 Phase II Appendix A Final Report	The purpose of this report is to publish the written comments provided by the IC to SCE in accordance with the timelines stated per Section 4.6.10 in GIP
WDT1203	[REDACTED]	1	11/24/2015	Queue Cluster 7 Phase II Appendix A Final Report	Report to disclose results of QC7 Phase II cluster.

## Executive Summary

██████████ an Interconnection Customer (IC), received a Queue Cluster 7 Phase II (QC7 Phase II) study report dated November 24, 2015 for its Interconnection Request (IR) to Southern California Edison (SCE) for their proposed ██████████ (Project), queue position WDT1203.

Subsequent to the distribution of the report, to comply with GIP obligation to IC's written comments on interconnection studies as modified by FERC Order 792, SCE is publishing any written comments submitted by the IC per Section 4.6.10:

- Within ten (10) Business Days of receipt of the QC7 PII report, but in no event less than three (3) Business Days before the Results Meeting conducted to discuss the report; and/or
- Additional comments on the final QC7 Phase II Interconnection Study report up to (3) Business Days following the Results Meeting

This addendum report discloses below the written comments provided by the IC to SCE in accordance with the timelines stated in GIP for QC7 Phase II study report dated November 24, 2015. The Phase II study report is unaffected by this addendum report.

QC7 Phase II – WDT1203 – [REDACTED]

1. Written comments provided by IC within ten (10) Business Days of receipt of the QC7 PII report.

a. **GLOBAL QUESTIONS**

**QUESTION #1**

As we discussed in prior meetings the POI will now be located closer to the [REDACTED] along the [REDACTED]. The pole number closest to the [REDACTED]. This POI is will be located next to the POI for [REDACTED]. This is to say that WDT 1203 and [REDACTED] will build separate interconnection facilities.

b. **DOCUMENT ID: QC7PI-SCE-NOL-Area Report.pdf**

**QUESTION # 1:**

We don't appear to have received Appendix G, is it applicable to WDT1203?

**QUESTION # 2:**

Please confirm whether any of the SPSs in B.4 impact WDT1203

**QUESTION # 3:**

We note that Section B.6 states "...neighboring utilities may identify need for physical upgrades within their system not identified in the studies." Given the project interconnection voltage and transmission location, we believe this risk to be extremely low. Does SCE agree? When will the impact, if any, be known definitively?

**QUESTION # 4:**

Just want to confirm that none of the upgrades in B.5 constrain WDT1203?

**QUESTION # 5:**

Section B.2 says that solar operates at [REDACTED] (but can be adjusted) and at [REDACTED] for deliverability. Section B.8 says that generation is operated at [REDACTED] for deliverability. Please clarify.

**QUESTION # 6:**

Table D.1 indicates that under normal conditions there is an [REDACTED]. Was this result with or without congestion management? Was WDT1203 a contributor?

**QUESTION # 7:**

The note to Table D.2 indicates that [REDACTED] was included in the analysis although the units were retired on January 1, 2015. The three year period required by the CAISO Business Practice Manual would expire December 31, 2017. Looking at Table 1 of Appendix B, it appears that [REDACTED] accounted for [REDACTED] of the total of [REDACTED]. Given the project requested COD of June 2018 per Attachment B, is it reasonable to believe that with the expiration of the [REDACTED] contribution two months earlier, that WDT1203 has a negligible impact insofar as the RNUs and ADNUs?

**QUESTION # 8:**

Given the location of [REDACTED] and the discussion in Appendix I, we believe there is no relationship between the [REDACTED] SCD issues discussed in D.5.1 and WDT 1203 are uncorrelated. Please confirm.

QC7 Phase II – WDT1203 – [REDACTED]

**QUESTION # 9:**

Given the location of [REDACTED] and the discussion in Appendix I, we believe there is no relationship between the [REDACTED] discussed in D.5.1 and WDT 1203 are uncorrelated. Based on Appendix A Attachment 2 we believe that WDT 1203 has no cost responsibility for the [REDACTED]. Please confirm.

**QUESTION # 10:**

Please confirm that the [REDACTED] discussed in F.2.1 have no cost impact for WDT1203.

c. **APPENDIX A**

**QUESTION #1**

We are requesting the following changes to Table A.1:

- The current plan is to have [REDACTED] If we maintain the same 5% impedance, is this a de minimis change?
- Advanced Energy, was the planned supplier of the inverters. They have since withdrawn from the market. What parameters must we adhere to so that the inverter change is a de minimis change? We understand we must have the capability for [REDACTED] as discussed in Section D.1.1 (ii)(a) as well as complying with the requirements of the Interconnection Handbook.

**QUESTION #2**

Please clarify the discussion in Section B regarding the supply of CTs and PTs. Please clarify who is providing and installing the PTs and CTs. Also please confirm that the same PTs and CTs can be used for both the SCE and IC provided CAISO revenue meter.

**QUESTION #3**

Please clarify how the VAR schedule discussed in Section C.3 will work in practice.

**QUESTION #4**

We believe the word "None" in the title of Section G is actually the response to the last question in Section F.

**QUESTION #5:**

Section N.14 essentially requires that if an earlier "approved" interconnection customer cancels their project, the portion of transmission system upgrades that the earlier project was paying for which our project was implicitly relying upon, that some or all of those costs could fall to us. If that happens, do we have an opportunity to exit the process without penalty other than forgoing already paid costs? What is SCE's experience with this happening for distribution level projects?

**QUESTION #6:**

Please confirm that when it comes to matters who is what responsible for what scope, that Appendix A Attachment 1 supersedes Appendix A Section B.

**QUESTION #7**

Appendix A of the project Phase 2 study report (Page 4, Section B.1) States the following:

"The project was modeled as with a [REDACTED] at the Generating Facility with its POI to the SCE Distribution System at the [REDACTED]"

QC7 Phase II – WDT1203 – [REDACTED]

[REDACTED] at the Point of Change of Ownership (POCO).”

Where is the [REDACTED] referred to here?

**QUESTION #8**

Appendix A of the project Phase 2 study report (Page 9, Section F.2) states the following:

“There are no deliverability constraints identified for the QC7 Phase II projects in the [REDACTED] Area”

Given that there are no earlier queued DNU requirement either, could CAISO and SCE confirm that the project will achieve FCDS upon IA COD?

**QUESTION #9**

Appendix A of the project Phase 2 study report (Page 9, Section G.1) states the following:

“As part of the QC7 interconnection process, a GIA is not scheduled to be tendered until after completion of the CAISO’s Reassessment and Transmission Planning Deliverability (TPD) Allocation Study Process which does not commence until late January 2016. The TPD Allocation is scheduled to be completed by April 2016.”

Given that this project is the only project in [REDACTED] why is there a need for TPD allocation at all?

d. **APPENDIX A ATTACHMENT 1**

**QUESTION #1**

See earlier questions regarding Table A.1.

**QUESTION #2**

Attachment 1 to Appendix A of the project Phase 2 study report (Page 3, Section 1.a.XIV) states the following:

“Designate, to the T1 circuit provider, the Distribution Provider as a representative authorized to report trouble to, and to initiate repairs with, the communication circuit provider on the Interconnection Customer’s behalf in the event of an interruption of service on the communication circuit if a T1 circuit is required for the support of a RTU installed locally at the Generating Facility.”

Please confirm that the telecom solution could be based on T1 circuit or equivalent?

**QUESTION #3**

Attachment 1 to Appendix A of the project Phase 2 study report (Page 3, Section 1.a.XIV) states the following:

“Designate, to the T1 circuit provider, the Distribution Provider as a representative authorized to report trouble to, and to initiate repairs with, the communication circuit provider on the Interconnection Customer’s behalf in the event of an interruption of service on the communication circuit if a T1 circuit is required for the support of a RTU installed locally at the Generating Facility.”

Please confirm that the telecom solution could be based on T1 circuit or equivalent?

**QUESTION #4**

Attachment 1 to Appendix A of the project Phase 2 study report (Page 6, Section 4) states the following:

“Not Used.”

QC7 Phase II – WDT1203 – [REDACTED]

What does not used mean in the context of Affected System? Also Section H.1 of the cluster study shows miniscule impact on WECC paths. Isn't that sufficient evidence of lack of Affected System impact?

e. **APPENDIX A ATTACHMENT 2**

**QUESTION #1**

Given that the revised POI for WDT1203 is located [REDACTED] please discuss the impact on the costs listed in the attachment.

**QUESTION #2**

What is the difference between the costs labeled "Telecommunications" and those labeled "Telemetry"?

**QUESTION #3**

WDT 1203 plans to install its own CAISO compliant metering. Please confirm that this negates the need for the line item [REDACTED] In addition, what is the impact to other costs listed?

**QUESTION #4**

WDT 1203 is installing CAISO compliant telecommunications. Isn't it possible for the indicated IF's to piggyback on these comms?

**QUESTION #5**

Please explain the need for the [REDACTED]

f. **APPENDIX A ATTACHMENT 3**

We believe we didn't receive this Appendix. Is it applicable to WDT1203 since there were no network upgrades to allocate?

g. **APPENDIX A ATTACHMENT 4**

No comments.

h. **APPENDIX A ATTACHMENT 5**

See Appendix H.

i. **APPENDIX A ATTACHMENT 6**

Not used.

j. **APPENDIX A ATTACHMENT 7**

No comments.

k. **APPENDIX B**

**QUESTION # 1:**

Are there any other units in Appendix B Table 1 that have been or plan to be retired like Coolwater?

l. **APPENDIX C**

No comments.

ADDENDUM  
IC SUBMITTED WRITTEN COMMENTS

QC7 Phase II – WDT1203 – [REDACTED]

**m. APPENDIX D**

No comments.

**n. APPENDIX E**

Not applicable, Appendix E is not used.

**o. APPENDIX F**

**QUESTION # 1:**

Some of the plots (mostly those with congestion management) show frequency does not recover to [REDACTED] and in some case there significant oscillation in frequency and voltage. Any design/equipment implications for WDT1203? We think not, but want to confirm.

**p. APPENDIX G**

We believe we didn't receive this Appendix. Is it applicable to WDT1203?

**q. APPENDIX H**

The [REDACTED] never appears in the tables.

**r. APPENDIX I**

Earlier question regarding our belief that the [REDACTED] issues discussed in D.5.1 are uncorrelated with WDT 1203. Please confirm.

**s. APPENDIX J**

Not used.

**t. APPENDIX K**

No comments.

**2. Written comments provided by IC three (3) Business Days following the Results Meeting.**

**a. None**