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# **Appendix A – WDT1297**

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## **Queue Cluster 8 Phase I Report**

**Revision #2**

**April 1, 2016**

This study has been completed in coordination with the California Independent System Operator Corporation (CAISO) per Southern California Edison Company's Wholesale Distribution Access Tariff, Attachment I Generator Interconnection Procedures (GIP)

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1. Interconnection Facilities, Network Upgrades, and Distribution Upgrades
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4. Distribution Provider’s Interconnection Handbook
5. Short Circuit Duty Calculation Study Results (see Appendix H of the QC8 Phase I Bulk Area Report)
6. Interconnection Customer Provided Dynamic Data
7. SCE Northern Hemisphere Import Nomogram
8. Subtransmission Assessment Report – [REDACTED]

Interconnection Study Document History

No.	Date.	Document Title	Description of Document
4	04/01/16	Queue Cluster 8 Phase I Appendix A Report Revision #2	Updated: Section B, Attachment 2 of this Appendix A report
3	03/28/2016	Addendum #1 to Queue Cluster 8 Phase I 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 4.5.7 in GIP
2	3/10/2016	Queue Cluster 8 Phase I Appendix A Report Revision #1	Updated: Section B, Attachment 1, and Attachment 2 of this Appendix A report
1	1/15/2016	Queue Cluster 8 Phase I Appendix A Report	Final Phase I interconnection study report

## A. Introduction

██████████ the Interconnection Customer (IC), has submitted a completed Interconnection Request (IR) to Southern California Edison Company (SCE) for their proposed ██████████. The Project requested a Point of Interconnection (POI) at Southern California Edison Company's (SCE) ██████████ on the ██████████ located in ██████████ CA. The IC requested Full Capacity Deliverability Status (FCDS) for their Project. The IC desires an In-Service Date (ISD) of November 1, 2020 and Commercial Operation Date (COD) of December 31, 2020. Such dates are specified in the Project's IR submittal. Actual ISD and COD will depend on detailed design, engineering, and construction requirements to interconnect the Project after the Generator Interconnection Agreement (GIA) has been executed and filed at Federal Energy Regulatory Commission (FERC) for acceptance.

In accordance with FERC approved CAISO Tariff Appendix DD Generator Interconnection and Deliverability Allocation Procedures (GIDAP), the Project was grouped with Queue Cluster 8 (QC8) Phase I projects to determine the impacts of the group as well as impacts of the Project on the CAISO Controlled Grid.

An Area and Subtransmission Report have been prepared separately which identify the combined impacts of all projects in the group on the CAISO Controlled Grid (Area Report) and impacts of projects seeking interconnection to distribution facilities served out of the ██████████ (Subtransmission Assessment Report – ██████████) both are included in the QC8 PI report package. This report focuses only on the impacts or impact contributions of the Project, and it is not intended to supersede any contractual terms or conditions specified in a GIA.

The report provides the following:

1. Transmission System impacts caused by the Project;
2. Distribution System impacts caused by the Project;
3. System reinforcements necessary to mitigate the adverse impacts caused by the Project under various system conditions;
4. A list of required facilities and a unit cost estimate of the Project's cost responsibility and time to construct<sup>1</sup> these facilities. Such information is provided in Attachment 1 and Attachment 2 as separate documents in the Appendix A Project report package.

All equipment and facilities comprising the Project's Generating Facility are located in Palmdale, California, as disclosed by the IC in its IR, as may have been amended during the interconnection Study process, which consists of (i) ██████████ with a rated output of ██████████ each for a combined gross rated output of ██████████ as measured at the inverter

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<sup>1</sup> It should be noted that construction is only part of the duration of months specified in the study, which includes detailed engineering, licensing, and other activities required to bring such facilities into service. These durations are from the execution of the GIA, receipt of: all required information, funding, and written authorization to proceed from the IC as will be specified in the GIA to commence the work.

terminals, (ii) the associated infrastructure and step-up transformers, (iii) meters and metering equipment, (iv) appurtenant equipment, and (v) auxiliary loads.

Based on the technical data provided, the internal generation facility losses were found to be [REDACTED] resulting in a net output, as measured at the high-side of the main transformer banks, of [REDACTED] (no auxiliary load and no step up transformer bank losses were identified). Losses on the [REDACTED] [REDACTED] were found to be minimal, thereby resulting in an estimated capacity delivery of [REDACTED] at the Point of Interconnection which is the [REDACTED] to the [REDACTED]

The Project shall consist of the Generating Facility and the IC's Interconnection Facilities as illustrated below in Figure A.1 and summarized below in Table A.1. Figure A.2 provides a map that illustrates the geographic location of the Project.

Figure A.1: Project IC Facilities One-Line Diagram

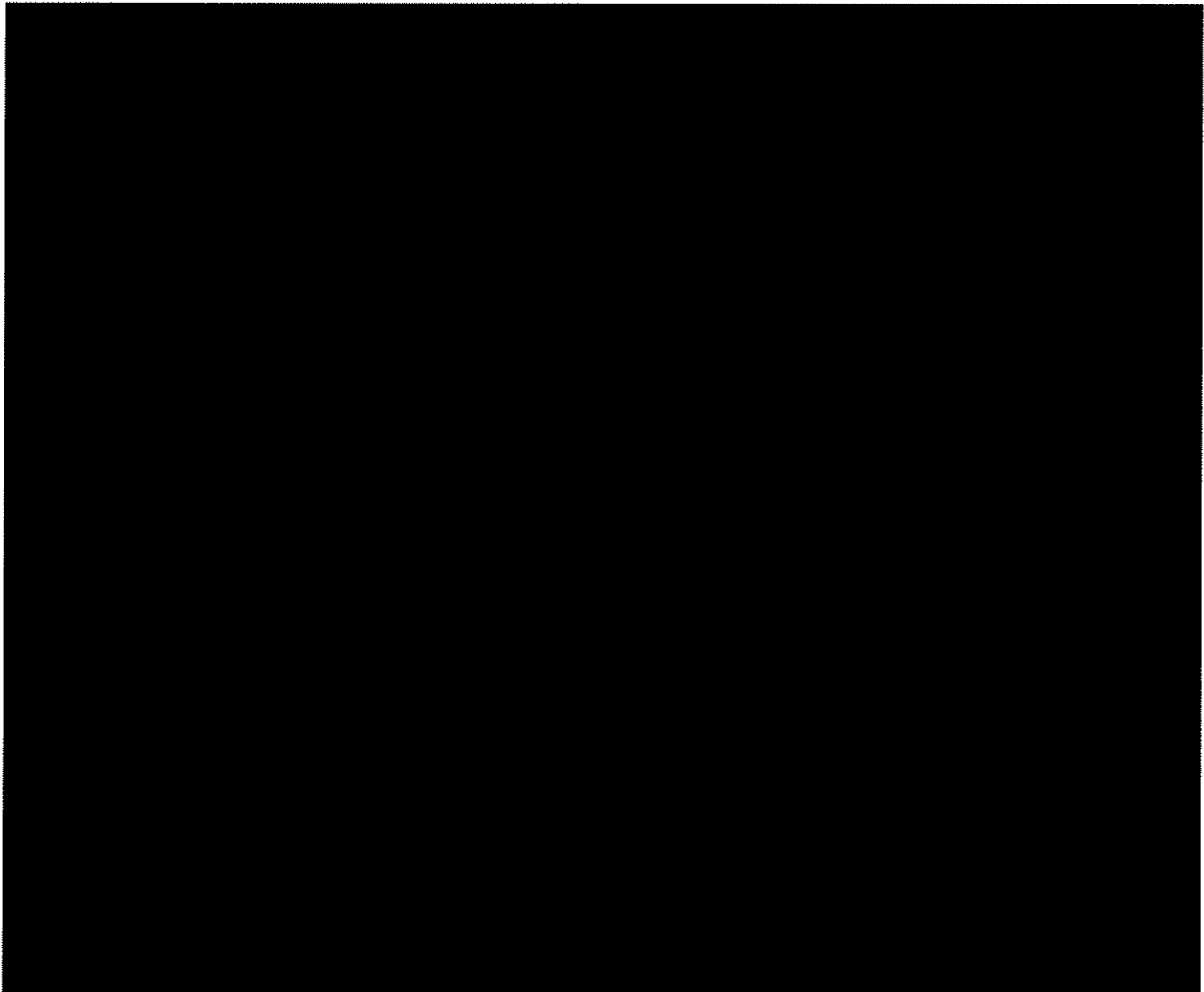


Figure A.2: Project Location Map

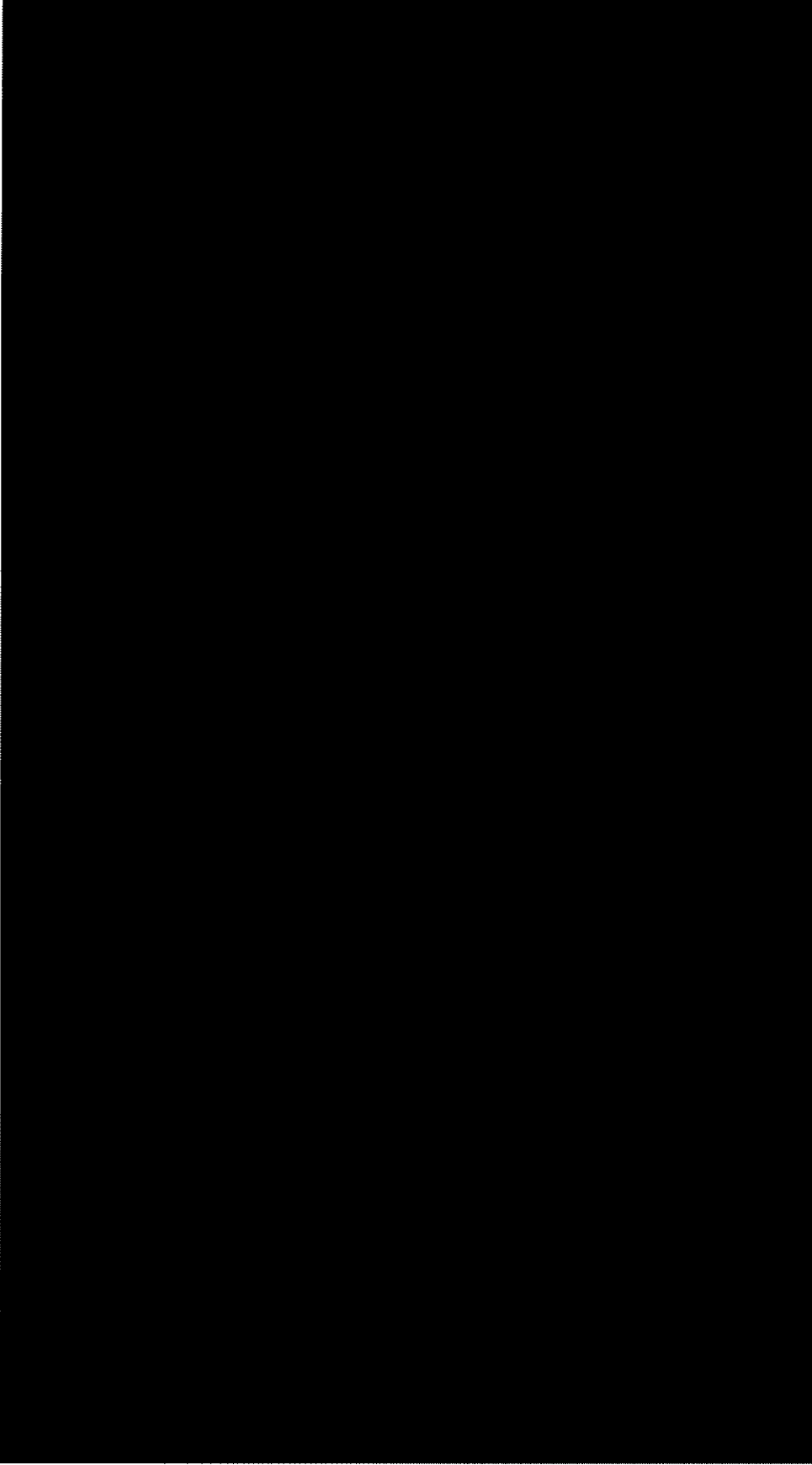


Table A.1 Project General Information

Project Location	[REDACTED]
Distribution Provider's Planning Area	SCE [REDACTED] Subtransmission System
Number and Types of Generators	[REDACTED]
Interconnection Voltage	[REDACTED]
POI	Distribution Provider's [REDACTED]
Gen-Tie	0.5 mile 336 Aluminum Conductor Steel Reinforced [REDACTED]
Step-up Transformer(s)	[REDACTED]
Estimated Losses on Gen-Tie	[REDACTED]
Step-Up Transformer (s) Losses	0 MW (IC did not provide R value)
Padmount Transformer Losses	0 MW (IC did not provide R value)
Generator Auxiliary Load	[REDACTED]
Internal Generation Facility Losses based on IC technical data for collector system equivalent	[REDACTED]
Maximum POI Delivery (Gross output less losses less aux load)	[REDACTED]
Power Factor Range	[REDACTED] at POI per interconnection application
IC Requested COD	December 31, 2020

**B. Study Assumptions**

For detailed assumptions regarding the group cluster analysis, please refer to the QC8 Phase I Area Report. Below are the assumptions specific to the Project:

1. The following is the Plan of Service (POS) assumed for the Project in the Phase I Study:  
 The Project was modeled as an expansion of [REDACTED] of gross generation at the Generating Facility delivering into the [REDACTED]
2. The following Facilities will be installed by SCE and **are included** in this Phase I Study:
  - The required relay replacements at [REDACTED]

- Lightwave, channel banks, and associated equipment at [REDACTED] and at the Generating Facility.
- Approximately [REDACTED]
- The required revenue metering cabinet and retail load meters.

**NOTE:** SCE installation does not include metering, voltage, and current transformers. The SCE Meters will be connected to the generator – owned voltage and current transformers to be installed for their CAISO metering.

3. The following Facilities will be installed by the IC and **are not included** in this Phase I Study:
  - The required CAISO metering equipment (voltage and current transformers and CAISO meters).

**NOTE:** The metering voltage and current transformers installed for the CAISO metering will also be used for the SCE owned retail load meters.

### C. Reliability Standards, Study Criteria and Methodology

The generator interconnection studies will be conducted to ensure the CAISO-controlled grid is in compliance with the North American Electric Reliability Corporation (NERC) reliability standards, WECC regional criteria, and the CAISO planning standards. Refer to Section C of the QC8 Phase I Bulk Area Report for details of the applicable reliability standards, study criteria and methodology.

### D. Power Flow Reliability Assessment Results

#### ❖ Discharge Analysis of the Project

##### I. Steady State Power Flow Analysis Results – 220 kV and above

The study did not identify any power flow issues on the Bulk Electric System not addressed via the use of CAISO Congestion Management or via already approved transmission upgrades. The Project will be required to participate in any congestion management mitigation until such time that the already approved transmission upgrades are placed into service. Consequently, the Project is not allocated cost for any Network Upgrades identified to address power flow issues. The details of the power flow analysis are provided in Section D of the Northern Area Report.

##### II. Steady State Power Flow Analysis Results – 66 kV

###### 1. Thermal Overloads

The study did not identify any power flow issues on the [REDACTED]. The details of the power flow analysis are provided in the Subtransmission Assessment Report.

###### 2. Voltage Performance



The Project is required to provide power factor regulation capability [REDACTED] at POI for asynchronous generation and [REDACTED] at generator terminals for synchronous generators) to alleviate power flow non-convergence and maintain the Transmission transfer capability.

### 3. Required Mitigations

No mitigations on the Subtransmission System were identified to be required by the Project.

❖ Charging Analysis of Project – This project does not involve energy storage.

## E. Short Circuit Duty Results

Short circuit studies were performed to determine the fault duty impact of adding the QC8 Phase I projects to the transmission system and to ensure system coordination. The fault duties were calculated with and without the projects to identify any equipment overstress conditions. Once overstressed circuit breakers caused by the inclusion of the QC8 projects and/or queued ahead generation were identified, the fault current contribution from each individual project in QC8 Phase I was determined. Each project in the cluster will be responsible for its share of the upgrade cost based on the rules set forth in CAISO Tariff Appendix DD.

### 1. Short Circuit Duty Study Input Data

The IC provided technical data for the identified inverter (specified in Section 2). SCE compared the technical data provided against manufacturer data, if the manufacturer Short Circuit Duty (SCD) information for the specific inverter was available. If the technical data provided by the IC differed from the inverter manufacturer data, then SCE utilized the manufacturer data in the SCD analysis. Based on the comparison, the technical data provided by the IC are consistent with the manufacturer data.

#### "Inverter Based Generation"

Data for Each generation unit: Maximum Fault contribution: [REDACTED]

Generation tie-line:

This generation tie-line impedance was based on Distribution Provider calculation of generation tie-line electrical parameters utilizing tower and line conductor characteristics provided by the IC.

Length:	██████████
Conductor:	██████████
Z1(p.u.) conductor impedance information:	██
Z0(p.u.) conductor impedance information:	██

Collector System:

Amperes	██████████
Z1(p.u.) conductor impedance information:	██

Generation Step-up and Pad-Mount Transformers

Technical details are provided above in Table A-1.

As the IC did not provide a resistance value associated with the Main Step-Up and pad-mount transformer, a value was derived by using a "typical" X/R ratio for similar equipment. Please note, an X/R value of ██████████ was applied for this study. This value will be required to be submitted, prior to commencement of Phase II.

2. Short Circuit Duty Study Results

All bus locations where the QC8 Phase I projects increase the short-circuit duty by ██████████ or more and where duty was found to be in excess of 60% of the minimum breaker nameplate rating are listed in the QC8 Phase I Area Report (Appendix H). These values have been used to determine if any equipment is overstressed as a result of the inclusion of QC8 Phase I interconnections and corresponding network upgrades, if any.

The responsibility to finance short circuit related Reliability Network Upgrades identified through a Group Study shall be assigned to all IRs in that Group Study pro rata on the basis of SCD contribution of each Generating Facility.

Please refer to the QC8 Phase I Area Report for the QC8 Phase I breaker evaluation which did not identify any additional overstressed circuit breakers triggered with the inclusion of QC8 Phase I without ADNUs.

As a sensitivity, ADNUs identified for QC8 Phase I were included to review the potential for additional SCD mitigation (classified as ADNU). This sensitivity study identified the effective duty at ██████████ to increase from ██████████ which is in excess of current maximum nameplate ratings. To mitigate this SCD problem, a system reconfiguration would be needed to lower SCD to within the maximum ██████████. No cost

estimates were identified for this mitigation at this time but will be further reviewed as part of QC8 Phase II.

### 3. SCE Substations with Ground Grid Duty Concerns

The short circuit studies flagged for further review a total of twenty-seven (27) existing substations where the QC8 Phase I Projects increased the substation ground grid duty by at least [REDACTED]. Additional review will be performed as part of Phase II to determine if any of these locations will require a detailed ground grid analysis performed as part of project execution once GIAs are in place and projects proceed forward towards interconnection.

### 4. Preliminary Protection Requirements

Protection requirements are designed and intended to protect the Distribution Provider's distribution system only. The preliminary protection requirements were based upon the interconnection plan as shown in the one-line diagram depicted in line item #7 in Attachment 1.

The IC is responsible for the protection of its own system and equipment and must meet the requirements in the Distribution Provider's Interconnection Handbook provided in Attachment 4.

## F. Transient Stability Evaluation

With the Project providing [REDACTED] as measured at the POI and including the required mitigation identified above, transient stability performance was found to be acceptable. Refer to enclosed QC8 Phase I Bulk Area Report and Subtransmission Assessment Report in the QC8 Phase I report package, for the QC8 Phase I transient stability evaluation criteria and assessment results.

## G. Power Factor Requirements

Based on the results of the Study, the Project will need to be designed to maintain a composite power delivery at continuous rated power at the POI at a power factor within the range of [REDACTED] at POI for asynchronous generation and [REDACTED] at generator terminals for synchronous generators. Additionally, the generation system must be designed to accommodate a VAR schedule provided by SCE. SCE will determine if the VAR schedule is necessary based on future re-arrangements of SCE's Transmission System.

## H. Deliverability Assessment Results

### 1. On Peak Deliverability Assessment

The Project does not contribute to any deliverability constraint.

### 2. Off- Peak Deliverability Assessment

Under off-peak conditions [REDACTED] are overloaded under various contingency conditions. For details, see Section E.2 of the Area Report.

### 3. Required Mitigations

No Delivery Network Upgrades are required.

### **I. Interconnection Facilities, Network Upgrades, and Distribution Upgrades**

Please see **Attachment 1** for the Distribution Provider's Interconnection Facilities (IF), Reliability Network Upgrades (RNUs), Delivery Network Upgrades (DNU) and Distribution Upgrades (DU) allocated to the Project. Please note that SCE will not "reserve" the identified IF for the proposed POI. The identified scope/facilities will be allocated to the Project upon the successful execution of the GIA and SCE has completed the detailed design and engineering of the facilities according to tariff timelines.

### **J. Cost and Construction Duration Estimates**

To determine the cost responsibility of each generation project in QC8 Phase I, the CAISO developed cost allocation factors (Attachment 3) for RNUs, Local Delivery Network Upgrades (LDNUs) and Area Delivery Network Upgrades (ADNUs). Attachment 2<sup>2</sup> provides the 'constant' 2015 dollars and their escalation to the estimated COD year for IF, RNUs, DNUs, and DUs which the Project was allocated cost.

For the QC8 Phase I Study, the estimated COD is derived by taking into account time requirements to complete the QC8 Interconnection Process to tender a GIA. A GIA is not scheduled to be tendered until after completion of the QC8 Phase II Studies, Reassessment and Transmission Planning Deliverability (TPD)<sup>3</sup> Allocation Study Process. The QC8 Phase II Study is scheduled to start on May 2016 and be completed by November 2016. Subsequently, the CAISO's Annual Reassessment effort and TPD Allocation Study does not commence until late January or early February 2017. The TPD Allocation Study is scheduled to be completed by April 2017. If the CAISO and SCE can make a determination that the TPD Allocation Study Process outcomes do not change the scope requirements, a letter will be provided at the end of April 2017<sup>4</sup> informing the IC that there are no changes to Network Upgrade requirements and initiating the GIA negotiation process. Otherwise, further re-assessment will be performed for the Project. Any updates to scope, cost and schedule are developed and updated Interconnection Study reports will be issued by the end of July 2017. The GIA negotiations commence after either the issuance of the letter of no change to Network Upgrade requirements at the end of April 2017 or upon issuance of the updated reports at the end of July 2017. Provided the Project does not elect to Park for one (1) year, the letter issued by the CAISO and/or the updated Interconnection Study reports will be used as the basis to proceed with the GIA negotiations. Assuming a three (3) month timeframe for GIA negotiations after the draft GIA has been issued to the IC, an executable GIA is not expected until either early August 2017 or early November 2017 depending on TPD Allocation Study Process results, which requires a decision from the IC to Park or proceed and will determine if the Project needs to complete the CAISO's Reassessment Study. QC8 Phase I assumed the duration of the work element begins in December 2017, which accounts for the GIA and submittal of required funds by the IC.

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<sup>2</sup> For Energy Storage Projects the Attachment 2 includes upgrade(s) identified from the "Charging" analysis.

<sup>3</sup> Transmission Plan Deliverability: Deliverability supported by the CAISO's Transmission Plan

<sup>4</sup> The TPD Allocation Process is estimated to complete in April 2017. The actual date may vary

Based on the above, the requested IC ISD of January 31, 2018 cannot be met due to the estimated 24<sup>5</sup> month timeline identified as required to construct the Interconnection Facilities (RTU) needed to support the project. Following the standard interconnection process, the ISD should be modified to reflect June 2019 but may be advanced to March 2019 depending on TPD study results.

The IC should note that any LDNUs and ADNUs allocated to the Project may be assessed 35% Income Tax Component of Contribution (ITCC) pending the results of the TPD Allocation Study Process several months after the QC Phase II Study Reports are released, in addition to the 35% ITCC assessed for the IF, DUs, and RNUs above the \$60K/MW repayment cap allocated to the Project. For your information, Attachment 2 contains a potential ITCC estimate<sup>6</sup> based on the Phase I cost in this study. It does not represent the “maximum ITCC exposure” of the Project. Attachment 3 provides an estimated non-reimbursable RNU cost that would be subject to ITCC, taking into account the Network Upgrade maximum cost responsibility. The maximum ITCC warranted by the Project will be addressed, calculated, and included during the GIA development phase once the IC submits the TP Deliverability Allocation Study Process options form used to confirm the acceptance, waiver (parking), or denial of the awarded deliverability assigned to the Project.

#### **K. SCE Technical Requirements**

The IC is responsible for the protection of its own system and equipment and must meet the requirements in the Distribution Provider’s Interconnection Handbook provided in Attachment 4.

#### **L. Subsynchronous Interaction Evaluations**

Certain generators or inverter based generators when interconnected within electrical proximity of series capacitor banks on the transmission system are susceptible to Sub-Synchronous Interaction (SI) conditions which must be evaluated. Subsynchronous Interaction evaluations include Subsynchronous Resonance (SSR) and Subsynchronous Torsional Interactions (SSTI) for conventional generation units, and Subsynchronous Control Instability (SSCI) for inverter based generators using power electronic devices (e.g. Solar PV and Wind Turbines).

For projects interconnecting at the 220 kV voltage level and above in close electrical proximity of series capacitor banks on the transmission system a study will need to be performed to evaluate the SI between generating facilities and the transmission system.

The IC is 100% responsible for any studies related to the SSR or SSTI. The only study that SCE will perform (at the IC’s expense) is for SSCI; to ensure that the Project does not damage SCE’s control systems.

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<sup>5</sup> Note this timeframe does not account for potential issues that may arise during construction of the underground fiber optic cable.

<sup>6</sup> The maximum ITCC exposure applies ITCC (35%) to assigned IF and DU facilities. For Network upgrades, costs that are not subject to transmission credits and/or exceed the \$60k/MW cap will be subject to ITCC (35%). For Option A facilities: The maximum ITCC exposure is calculated by applying the following formula:  $(IF*35\%) + ((RNU\ Costs - (Project\ MW*($60k/MW)))*35\%) + (DU*35\%)$ . For Option B facilities: The maximum ITCC exposure is calculated by applying the following formula:  $(IF*35\%) + ((RNU\ Costs - (Project\ MW*($60k/MW)))*35\%) + (LDNU*35\%) + (ADNU*35\%) + (DU*35\%)$

The SSCI study will require that the IC provide a detailed PSCAD model of its Generating Facility and associated control systems, along with the manufacturer representative's contact information. The study will identify any mitigation(s) that will be required as part of project execution and need to be completed prior to initial synchronization of the Generating Facility. The study and the proposed mitigation(s) shall be at the expense of the IC.

It is the IC's responsibility to select, purchase, and install turbine/inverter based generators that are compatible with the series compensation in the area.

#### **M. Environmental Evaluation, Permitting, and Licensing**

Please see Appendix K of the QC8 Phase I Bulk Area Report.

#### **N. Affected Systems Coordination**

Please see Section H of the QC8 Phase I Bulk Area Report.

#### **O. Items not covered in this study**

##### **1. Conceptual Plan of Service**

The results provided in this study are based on conceptual engineering and a preliminary POS and are not sufficient for permitting of facilities. The POS is subject to change as part of detailed engineering and design.

##### **2. IC's Technical Data**

The study accuracy and results for the QC8 Phase I Study are contingent upon the accuracy of the technical data provided by the IC. Any changes from the data provided could void the study results.

##### **3. Study Impacts on Neighboring Utilities**

Results or consequences of this QC8 Phase I Study may require additional studies, facility additions, and/or operating procedures to address impacts to neighboring utilities and/or regional forums. For example, impacts may include but are not limited to WECC Path Ratings, short circuit duties outside of the CAISO Controlled Grid, and sub-synchronous resonance (SSR). Refer to Affected Systems Coordination Section of the QC8 Phase I Bulk Area Report for additional information.

##### **4. Use of Distribution Provider Facilities**

The IC is responsible for acquiring all property rights necessary for the IC's Interconnection Facilities, including those required to cross Distribution Provider facilities and property. This Interconnection Study does not include the method or estimated cost to the IC of Distribution Provider mitigation measures that may be required to accommodate any proposed crossing of Distribution Provider facilities. The crossing of Distribution Provider property rights shall only be permitted upon written agreement between Distribution Provider and the IC at Distribution Provider's sole determination. Any proposed crossing of Distribution Provider property rights

will require a separate study and/or evaluation, at the IC's expense, to determine whether such use may be accommodated.

5. Distribution Provider's Interconnection Handbook

The IC shall be required to adhere to all applicable requirements in the Distribution Provider's Interconnection Handbook. These include, but are not limited to, all applicable protection, voltage regulation, VAR correction, harmonics, switching and tagging, and metering requirements.

6. Western Electricity Coordinating Council (WECC) Policies

The IC shall be required to adhere to all applicable WECC policies including, but not limited to, the WECC Generating Unit Model Validation Policy.

7. System Protection Coordination

Adequate Protection coordination will be required between Distribution Provider-owned protection and IC-owned protection. If adequate protection coordination cannot be achieved, then modifications to the IC-owned facilities (i.e., Generation-tie or Substation modifications) may be required to allow for ample protection coordination.

8. Standby Power and Temporary Construction Power

The QC8 Phase I Study does not address any requirements for standby power or temporary construction power that the Project may require prior to the ISD of the Interconnection Facilities. Should the Project require standby power or temporary construction power from Distribution Provider prior to the ISD of the IF, the IC is responsible to make appropriate arrangements with Distribution Provider to receive and pay for such retail service.

9. Licensing Cost and Estimated Time to Construct Estimate (Duration)

The estimated licensing cost and durations applied to this Project are based on the Project scope details presented in this study. These estimates are subject to change as Project environmental and real estate elements are further defined. Upon execution of the GIA, additional evaluation including but not limited to preliminary engineering, environmental surveys, and property right checks may enable licensing cost and/or duration updates to be provided.

10. Network/Non-Network Classification of Telecommunication Facilities

The cost for telecommunication facilities that were identified as part of the IC's Interconnection Facilities was based on an assumption that these facilities would be sited, licensed, and constructed by the IC. The IC will own, operate, maintain, and construct diverse telecommunication paths associated with the IC's generation tie line, excluding terminal equipment at both ends. In addition, the telecommunication requirements for SPS were assumed based on tripping of the generator breaker as opposed to tripping the circuit breakers at the Distribution Provider substation. Due to uncertainties related to telecommunication upgrades for the numerous projects in queue ahead of QC8 Phase I, telecommunication upgrades for higher queued projects were not considered in this study. Depending on the outcome of interconnection studies for higher queued projects, the telecommunication

upgrades identified for QC8 Phase I may be reduced. Any changes in these assumptions may affect the cost and schedule for the identified telecommunication facilities.



#### 11. Ground Grid Analysis

A detailed ground grid analysis will be required as part of the detailed engineering for the Project at the SCE substations whose ground grids were flagged with duty concerns.

#### 12. Applicability

This document has been prepared to identify the impact(s) contributions of the Project on the SCE electrical system; as well as establish the technical requirements to interconnect the Project to the POI that was evaluated in the QC8 Phase I Study for the Project. Nothing in this report is intended to supersede or establish terms/conditions specified in fully executed GIAs.

#### 13. Process for synchronization/trial operations and commercial operations of the Project

The IC is reminded that the CAISO has implemented a New Resource Implementation (NRI) process that ensures that a generation resource meets all requirements before synchronization/trial operations and commercial operations. The NRI uses a bucket system for deliverables from the IC that are required to be approved by the CAISO. The first step of this process is to submit an "ISO Initial Contact Information Request form" at least seven (7) months in advance of the planned initial synchronization. Subsequently an NRI project number will be assigned to the project for all future communications with the CAISO. The PTOs have no involvement in this NRI process except to inform the IC of this process requirement. Further information on the NRI process can be obtained from the CAISO Website using the following links:

New Resource Implementation webpage:

<http://www.caiso.com/participate/Pages/NewResourceImplementation/Default.aspx>

NRI Checklist:

<http://www.caiso.com/Documents/NewResourceImplementationChecklist.xls>

NRI Guide:

<http://www.caiso.com/Documents/NewResourceImplementationGuide.doc>

#### 14. Potential Changes in Cost Responsibility

The IC is hereby placed on notice that interconnection of its proposed Generating Facility may be dependent upon certain Network Upgrades which are currently the cost responsibility of projects ahead of the proposed Generating Facility in the interconnection application queue. Section 14.2.2 of the GIDAP provides that should Network Upgrades required for queued-ahead projects be included in an executed GIA (or unexecuted GIA filed at FERC) at the time of withdrawal of the earlier queued Generating Facility, and the upgrades are determined to still be needed by later queued Generating Facilities, the financial responsibility for such upgrades falls to the Distribution Provider. However, if the Network Upgrades required by earlier queued Generating Facilities are not subject to an executed GIA (or unexecuted GIA filed at FERC) the financial responsibility for such upgrades may fall to the IC. Section 14.2.2 also discusses how Network Upgrades required by interconnection customers selecting Option (B) might be required to be reapportioned among interconnection customers selecting Option (B) in the case of withdrawals of earlier queued generating facilities. Changes in costs allocated to the IC could also arise as the result of the CAISO's Reassessment Study process described in Section 7.4 of

the GIDAP. SCE encourages the IC to review Sections 7.4 and 14.2.2 of the GIDAP for the rules and processes under which the financial responsibility might be reapportioned to the IC. Potential changes in the IC's cost responsibility resulting from application of the provisions of these Sections of GIDAP are not included in this QC8 Phase I Study, nor are the potential impacts to the IC's maximum cost responsibility outlined.

15. Charging restrictions may occur in the future under future base case overloads.
16. Additional limitations may be driven by the CAISO market and distribution system operations.
17. Please note that SCE has made its best efforts to convey as much information possible based on information provided by the IC about its proposed project. The information contained herein may indicate to ICs that a project of its magnitude may be better suited to interconnect at higher voltage levels, or downsize as to not incur significant amount of restrictions. Any determination to change POIs or downsize is purely at the IC's discretion and would be subject to a SCE material modification review pursuant to the tariff.

**Attachment 1**  
**Interconnection Facilities, Network Upgrades and Distribution Upgrades**  
Please refer to separate document

**Attachment 2**  
**Escalated Cost and Time to Construct for Interconnection Facilities, Reliability Network  
Upgrades, Delivery Network Upgrades, and Distribution Upgrades**  
Please refer to separate document

**Attachment 3**  
**Allocation of Network Upgrades for Cost Estimates and Maximum Network**  
**Upgrade Cost Responsibility**  
No Network Upgrade costs were assigned to the Project

**Attachment 4**

**Distribution Provider's Interconnection Handbook**

Preliminary Protection Requirements for Interconnection Facilities are outlined in the Distribution Provider's Interconnection Handbook (separate document)

**Attachment 5**  
**Short Circuit Duty Calculation Study Results**  
Please refer to the Appendix H of the QC8 Phase I Bulk Area Report

**Attachment 6**  
**Interconnection Customer Provided Dynamic Data**  
The following data were submitted by the IC for Dynamic simulation:

[Redacted Data]



**Attachment 7**  
**SCE Northern Hemisphere Import Nomogram**  
Please refer to separate document

**Attachment 8**  
**Subtransmission Assessment Report**  
Please refer to separate document