

Wholesale Distribution Open Access Tariff (WDAT) Deliverability Options

The California Independent System Operator Corporation (“CAISO”) Cluster Study Process for Deliverability

Any WDAT project that wishes to apply for Full Capacity Deliverability Status (“FCDS”) through the CAISO Cluster studies must have their IR submitted, validated and approved by April 15 (or the next business day if this is a weekend). The project must inform San Diego Gas & Electric Company (“SDG&E”) that they wish to be studied with the current cluster (Cluster 11 in 2018) so that SDG&E can forward their IR to the CAISO for inclusion in the study. The Interconnection Customer (“IC”) is expected to pay for the actual costs of the studies: Phase I and Phase II as well as three subsequent Reassessments. This option (historically) has the highest likelihood of obtaining FCDS since it is not based on “leftover” deliverability or nodes that were selected by SDG&E or the CAISO for inclusion in the study. Projects would be responsible for any Network Upgrades identified in the Deliverability assessment. These may include Reliability Network Upgrades (“RNU”) as well as Local Delivery Network Upgrades (“LDNU”). If Area Delivery Network Upgrades (“ADNU”) are identified, the IC has two options: Option A would involve the IC not funding the ADNUs or Option B would involve funding the ADNUs.

For more information on the CAISO studies, please see [Appendix DD to the CAISO Conformed Tariff](#). This appendix is known as Generator Interconnection Deliverability Allocation Procedures (“GIDAP”).

Annual Full Capacity Deliverability Option (“AFCDO”)

ICs that are eligible for Deliverability under this study must adhere to the following requirements prior to the end of the Phase II study (of the Cluster in which they are within):

1. Previously studied as Energy Only (“EO”) Deliverability Status, and
2. All Interconnection Studies must have been completed, OR the IC must currently have an EO Generator Interconnection Agreement (“GIA”) which is in good standing

Failure to meet these requirements before the end of Phase II will result in forfeiture of requested deliverability.

To request inclusion in the CAISO AFCDO, the IC must contact SDG&E by sending an e-mail to GIEngineers@semprautilities.com and inform SDG&E of the IC’s intent to be included in the AFCDO. The IC must also submit a non-refundable study fee of \$10,000. This must be done during the current cluster’s Interconnection Request (“IR”) window, which is typically between April 1 – 15 of the given calendar year (unless April 1 or April 15 fall on a weekend, in which case it would be the next business day).

After the CAISO completes the deliverability studies (after Phase I and Phase II) for the ICs in the Queue Cluster, the CAISO will perform additional studies to determine the availability of remaining transmission system capability for ICs requesting FCDS as part of the AFCDO. These studies are done at the end of Phase II of the Cluster in which the project is studied. The IC will receive a report from the

CAISO to inform them if there is sufficient available transmission capability for the IC to achieve Full Capacity Deliverability Status. If the assessment determines that there is some transmission capacity available for use by the IC, but less than is necessary to achieve Full Capacity (“FC”) Deliverability, then the project will be considered to be partially deliverable, and the amount of transmission capability made available will be rounded down to the nearest 50 MW increment.

For more information on AFCDO, please see Section 9.2 of [Appendix DD to the CAISO Conformed Tariff](#).

Distributed Generation Deliverability (“DGD”)

The CAISO performs a DGD study annually and posts the result around February of each year. After the results are posted, if there is a project located at a node where Deliverability is deemed available, then SDG&E has the right to allocate Deliverability to that project. Accordingly, SDG&E will contact that IC and ask if they would like to accept FCDS at that location. The IC will then need to inform SDG&E of their acceptance of the FCDS. SDG&E then forwards the IC’s response to the CAISO.

Note that there is no action required on the IC’s part prior to the commencement of the CAISO’s DGD study and no associated fees. To qualify for a Deliverability Status assignment, a DG Facility must be in commercial operation or have a Commercial Operation Date (COD) that is no later than three years from the last date on which the application is submitted for the current DG Deliverability Assessment cycle.

Additionally, a DG Facility is eligible to receive a Deliverability Status assignment from an IOU PTO in the current DG Deliverability Assessment cycle if it meets the following applicable requirements:

1. For an existing DG Facility in Commercial Operation and interconnected to the Distribution System of an IOU PTO:
 - a. If no Deliverability (*i.e.*, EO), the DG Facility can apply for Partial Capacity (“PC”) or FCDS.
 - b. If Partial Deliverability, the DG Facility can apply for higher PC or FC Deliverability Status.
2. The DG Facility has an active interconnection request under a WDAT or Rule 21 with no requested deliverability (*i.e.*, EO) and has received its Phase I Interconnection Study results or equivalent.
 - a. An “equivalent” study for these types of projects is typically the first study performed for the project (*i.e.*, system impact study).
 - b. This category includes projects that originally requested EO deliverability but later requested deliverability through the AFCDO, but have not obtained deliverability through that process.
3. The DG Facility has an active interconnection request under a WDAT or Rule 21 with EO, PC, or FC Deliverability Status requested and has not received its Phase I Interconnection Study results or equivalent.
 - a. For FC or PC Deliverability requests that will receive system impact and facilities studies relating to an EO request, and Phase I and Phase II study reports for a deliverability

- request, the system impact and facilities studies are *not* considered equivalent to the Phase I study for purposes of determining eligibility.
- b. For FC or PC Deliverability requests, the equivalent study is typically the first interconnection study that includes a deliverability assessment. For projects studied in the older serial process, it is the applicable ISO deliverability assessment.
 - c. For EO requests, the equivalent study is typically the first interconnection study performed for the project (*i.e.* system impact study).
 - d. This category does not include projects that submitted an EO request initially and then later requested deliverability through the AFCDO.

For more information on DGD, please see [Section 40.4.6.3 of the CAISO Conformed Tariff](#).