

CALWEA COMMENTS ON PROPOSED GENERATION INTERCONNECTION PROJECTS

The California Wind Energy Association (CalWEA) offers these comments on the April 22nd revised draft version of the ISO's *2010 CAISO Transmission Plan: Study Plan (Revised Draft)*. Our comments focus on two areas, related to proposals submitted in the 2008 Request Window (RW) related to generation interconnections and considered for inclusion in this Transmission Planning Process (TPP) cycle – both study and project proposals.

Our main concern, detailed below stem from the on-going confusion about whether proposals related to generation interconnections should be submitted through the Request Window (and addressed in the TPP) or addressed in the Large Generator Interconnection Process (LGIP) (or Small Generator Interconnection Process (SGIP), as appropriate).

Generally, it seems appropriate for proposals to serve large, regional areas, not tied necessarily to specific projects, to be addressed in the TPP, while those tied to an individual project or cluster should be addressed in the LGIP. Consideration of the latter in the TPP would effectively give the generation projects they would serve an advantage over other generation projects and undercut the recent LGIP reforms (and perhaps the Location Constrained Resource Interconnection Facility (LCRIF) rules as well).

We are extremely concerned that confusion about the proper venue for consideration of transmission upgrades for generator interconnections appears to have allowed submission of inappropriate study and project proposals through the 2008 Request Window, and that the ISO proposes to consider them in this planning cycle. It is clear that at least some of these proposals (particularly the project proposals) involve transmission upgrades intended to serve single or small groups of generation projects.

Our concerns here are twofold:

- ***The PTO criteria for selecting projects for submission into the 2008 Request Window are not clear.***
 - At least some of the generation projects which may have Power Purchase Agreements (PPAs) with the same PTOs that are sponsoring (or, in the case of the study proposals, would sponsor) the transmission upgrades. Thus, projects having PPAs with the PTO procurement arms may have been given preferential treatment through these submittals.
 - Many or most of the generation projects that would be served by these upgrades are classified as Transition Cluster. Thus, the 2008 Request Window submittals were made before or very early in the Phase 1 Study process, effectively allowing transmission needs for these for this generation to take priority over other Transition Cluster projects.
- ***The ISO should define more clearly the proper venue for consideration of transmission upgrades to serve generation projects,*** to avoid chaos and/or potential gaming. If generation projects can get priority treatment of their transmission upgrades through submission through the Request Window, that process will soon be overrun by study and project proposals that should be addressed in the LGIP process.

Recommendations: We understand that the 2008 Request Window process – the first of its kind – was somewhat chaotic, and we do not wish to stand in the way of transmission planning and construction for new generation projects. However, we recommend that the ISO do the following:

- ***Mitigate the damage caused by the past lack of clarity***, by considering the 2008 Request Window generation-related study and project proposals in this planning cycle in a broader context, instead of discretely. Instead, the ISO should combine and/or modify these proposals in its consideration of them to more appropriately consider larger areas and other potential generation projects, in particular during its incorporation of RETI results into the planning process.
- ***Clearly state its going-forward policy*** regarding the appropriate venue for consideration of transmission upgrades related to generator interconnections. This policy should provide for:
 - Submission in the Request Window (and consideration in the TPP) only of study and project proposals concerning service to broad geographic areas or regions (or, as required in the TPP rules, LCRIFs identified in Phase 1 Studies).
 - Consideration of other studies or projects for transmission upgrades to serve generation projects – those related to one or a small number of plants, or a single cluster (aside from LCRIFs) – in the LGIP. The ISO should clearly state that it will reject such proposals if submitted through the Request Window into the TPP.