



Submit comment on Draft Final Proposal - Phase 1

Initiative: Interconnection process enhancements 2021

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1. Please provide a summary of your organization's comments on the Interconnection Process Enhancements (IPE) draft final proposal for Phase 1: Near-Term Enhancements: *

CalWEA supports the proposal on most of the near-term topics, but still has concerns as follows:

- CalWEA strongly opposes the element of the TPD allocation proposal wherein new Group 4 projects would be required to withdraw if they do not receive a TPD allocation after two attempts. Currently, converting to EO status is an option for all groups that do not receive a TPD allocation.
- CalWEA generally supports the ISO's proposal that site exclusivity be required to progress into the Phase II study process; however, we recommend that 50% of the site exclusivity deposit be made non-refundable only if the IC withdraws the interconnection request after the Phase 1 IFS posting deadline; otherwise, it should be fully refundable.
- CalWEA asks the ISO to streamline the policy and process for interconnection of projects before their RNUs are implemented and include it as a long-term topic. In this regard, CalWEA recommends that a fee-based, non-binding Limited Operation Study (LOS) be performed, as part of the annual reassessment to evaluate whether projects with executed GIAs can interconnect at the dates requested by the project developer.

2. Provide your organization's comments on the ISO's proposal to remove the downsizing window and simplifying downsizing request requirements, as described in section 3.1:

CalWEA supports the ISO proposal.

3. Provide your organization's comments on the ISO's proposal for revising the Transmission Plan Deliverability (TPD) Allocation process, as described in section 3.2:

- CalWEA supports collapsing six groups (1, 2 and 4-7) into the new 4 groups (the originally proposed 3 groups and the new group 4).
- CalWEA strongly opposes the element of the proposal wherein new Group 4 projects would be required to withdraw if they do not receive TPD allocation after two attempts. Currently, converting to EO status is an option for all groups that do not receive a TPD allocation. The ISO should not deprive generating resources of the right to participate as EO resources when there is limited transmission capacity.

4. Provide your organization's comments on the ISO's proposal for developing an emergency generation interconnection process, as described in section 3.3:

CalWEA appreciates the clarification but continues to oppose. We believe the emergency process could be misused by PTOs via the PUC, upsetting a well-functioning competitive market.

5. Provide your organization's comments on the ISO's proposal for determining if site exclusivity be required to progress into the Phase II study process, as described in section 4.1:

CalWEA supports with modification. We suggest that 50% of the site exclusivity deposit only become non-refundable if the IC withdraws the interconnection request after the site exclusivity deadline, i.e., 10 business days prior to the initial IFS posting. Otherwise, it should remain fully refundable.

6. Provide your organization's comments on the ISO's proposal for the expanded errors and omissions process to provide criteria and options when changes to network upgrade requirements occur after Financial Security (IFS) postings have been made, as described in section 5.1:

CalWEA supports the ISO proposal.

7. Provide your organization's comments on the ISO's proposal for clarifying the definition of Reliability Network Upgrade (RNU), as described in section 5.2:

CalWEA does not object to the proposal but believes that the achievable earliest COD of a resource should not be impacted by the RAS when congestion management is feasible in lieu of the deliverability study triggered RAS.

8. Provide your organization's comments on the ISO's proposal for transferring Participating Transmission Owner (TO) Wholesale Distribution Access Tariff (WDAT) Projects into ISO Queue, as described in section 5.3:

CalWEA supports the ISO proposal.

9. Provide your organization's comments on the ISO's proposal for changing sites and POIs during IR validation, as described in section 5.4:

CalWEA supports the ISO proposal.

10. Provide your organization's comments on the ISO's proposal for should parked projects be allowed to submit any type of MMAs while parked, as described in section 5.5:

CalWEA supports the ISO proposal.

11. Provide your organization's comments on the ISO's proposal for adding due dates for curing deficiencies in Appendix B, to avoid delays in starting Phase II studies, as described in section 6.1:

CalWEA supports the ISO proposal. CalWEA suggests the ISO reduce information required to what the PTO and ISO really need for the study in Appendix B. For example, the requirement for a 7.5-minute quadrangle of the site is outdated and redundant to the kmz file of the site that is already required. Other information, such as physical dimensions, bus length, tower numbers, number of third-party easements, alternate source of auxiliary power, and PLC protocol are only known at the time of project implementation and are not needed for the Phase 2 study (or the Facility Study for ISP applications).

12. Provide your organization's comments on the ISO's proposal for modifications to commercial viability criteria, as described in section 6.2:

CalWEA supports the modifications to commercial viability criteria. However, CalWEA restates the previous recommendation that the ISO should streamline the policy and process for projects achieving ISD before all RNUs are implemented. There should be a mechanism for the developers to get an indication whether the project can interconnect before all their RNUs are in-service. Upon request by the project developer, a fee based non-binding Limited Operation Study (LOS), as part of the annual reassessment, should evaluate whether projects with executed GIAs can interconnect at dates requested by the project developer.

13. Provide your organization's comments on the ISO's proposal for expanding deliverability transfer opportunities, as described in section 6.3:

CalWEA supports the ISO proposal.

14. Provide your organization's comments on the ISO's proposal for recommending there be a requirement that any IR that proposes to utilize a third party owned gen-tie must provide documentation as part of their IR that demonstrates that the gen-tie owner has agreed to the project using its gen-tie, as described in section 6.4:

CalWEA is concerned with the letter of intent being required at the IR submission that documents the intent of the parties to negotiate the terms of the sharing agreement. We believe the letter should be required by the time that Appendix B is due and the executed agreement be required by GIA execution.

15. Provide your organization's comments on the ISO's proposal for recommending that after the IR validation, the ISO should be consistent in using RIMS for all documents, details, etc. related to projects, as described in section 6.5:

CalWEA supports the ISO proposal.

16. Please provide additional comments on the IPE Final Proposal – Phase 1 not mentioned above:

n/a