



## Submit comment on Revised straw proposal

Initiative: Interconnection process enhancements 2021

[Submitted via CAISO's online portal]

### 1. Provide a summary of your organization's comments on the Interconnection Process Enhancements (IPE) 2021 – Phase 2 revised straw proposal: \*

CalWEA's primary concerns are as follows.

- CalWEA urges the ISO to take care not to discourage companies from submitting a reasonable number of projects into the queue – i.e., a number of projects for which due diligence can reasonably be expected to have been conducted, and not to penalize companies before they are able to obtain specific information in the scoping meeting. We therefore recommend that the first tier of the study deposit include up to 5 Interconnection Requests (IRs), and that deposits be fully refundable up to 30 days after the scoping meeting. Higher deposits with capped non-refundability are reasonably applied to developers that submit a higher number of applications. In combination with additional penalties later in the process, these measures provide sufficient discouragement of speculation without unduly penalizing developers with well-formed projects.
- CalWEA opposes requiring Interconnection Customers (ICs) to finance network upgrade costs exceeding a certain threshold of the net investment for all low voltage transmission facilities of the PTO. The cost should be borne by all parties that benefit from accessing the generation enabled by the transmission upgrades.

### 2. Please comment on section 3.3 - Transparency enhancements: Which data items do you support being public? \*

CalWEA supports making public the following data:

- PCDS and IDS %
- Phase level data of gen and fuel type, MW, operational dates
- MWh of storage
- Suspension status and timing of a project
- Parking status
- Construction status

### 3. Please comment on section 3.3 - Transparency enhancements: Which data items do you support not being public and why? \*

CalWEA believes that these data are market sensitive and should not be made public:

- TP deliverability group and allocation
- PPA executed and MW
- Project Affected System status

**4. Please comment on section 3.3 - Transparency enhancements: Are there other data items you would like to see as public information? \***

No comment at this time.

**5. Please comment on section 3.3 - Transparency enhancements: What are your thoughts on allowing Interconnection Customers to make their data public? \***

No comment at this time.

**6. Please provide comments on the following question related to section 3.4: Revisiting the criteria for PPAs to be eligible for a Transmission Plan Deliverability (TPD) allocation: a) Should the allocation of TPD require a PPA that procures the project's RA capacity for some minimum term? Please provide reasoning supporting your answer. b) If yes, what should that minimum term be and what is the basis for that? \***

CalWEA supports requiring a minimum PPA term of three years, which will indicate that a project is commercially viable without creating an unduly high barrier to obtaining TPD status.

**7. Please provide comments on the following question related to section 3.4: Revisiting the criteria for PPAs to be eligible for a Transmission Plan Deliverability (TPD) allocation: a) Should a PPA that is with an entity that does not have an RA obligation be eligible for an allocation if the procuring entity demonstrates that it has a contract to sell the RA capacity procured to a load servicing entity that has an RA obligation? Please provide reasoning supporting your answer. b) If yes, should the procuring entity be given extra time after the project receives an allocation to secure a contract with a load serving entity with an RA obligation? Please provide reasoning supporting your answer. c) If yes, what length of extra time should be provided and what is the basis for that? \***

Yes, to facilitate contracts with non-LSE buyers, CalWEA supports the TPD eligibility of a PPA with an entity that does not have an RA obligation. The procuring entity should be allowed one year after its TPD allocation to demonstrate that it has a contract to sell the RA capacity to a California load serving entity that has an RA obligation.

**8. Please comment on section 4.1: Should higher fees, deposits, or other criteria be required for submitting an IR? \***

CalWEA believes it is reasonable for an interconnection customer to submit up to five interconnection requests in one cluster window because it is reasonable to assume that sufficient due diligence can be conducted on this number of projects (whereas more speculation will likely be involved as that number increases). Therefore, the first tier should be for 1 to 5 IRs. To discourage

speculation, CalWEA supports higher deposits if more than 5 IRs are submitted by the same parent company.

CalWEA opposes any non-refundability of unused study deposits if withdrawn within 30 days from the scoping meeting. The scoping meeting is the first opportunity to get transmission information for a particular project. CAISO should encourage, not discourage, interconnection customers to make informed decisions based on transmission conditions as this stage. Penalties for withdrawing after the scoping meeting are sufficient to discourage speculation.

**9. Please comment on section 5.1: Should the ISO re-consider an alternative cost allocation treatment for network upgrades to local (below 200 KV) systems where the associated generation benefits more than, or other than, the customers within the service area of the Participating TO owning the facilities? \***

CalWEA opposes requiring ICs to finance network upgrade costs exceeding the funding cap. The cost should be borne by all parties that benefit from accessing the generation enabled by the transmission upgrades.

**10. Please comment on section 5.2: Policy for ISO as an Affected System – a) How the base case determined b.) How required upgrades are paid for: \***

CalWEA has no objection to the ISO proposal.

**11. Please comment on section 5.3: While the tariff currently allows a project to achieve its COD within seven (7) years if a project cannot prove that it is actually moving forward to permitting and construction, should the ISO have the ability to terminate the GIA earlier than the seven year period? \***

CalWEA supports the ISO invoking the default clause in the GIA to manage this.

**12. Please comment on section 5.3: Do you have any concerns with the ISO's proposed implementation? \***

CalWEA supports the ISO proposal with the clarification ISO made during the stakeholder call that the energy-only project is terminated if it contributes to the short circuit duty that requires mitigation.

**13. Please comment on section 5.3: Are there other opportunities the ISO should consider with respect to projects not moving through the queue? \***

No comments at this time.

**14. Please comment on section 6.2: Examining the issue of when a developer issues a notice to proceed to the PTO, requesting the PTO/ISO should start planning for all upgrades that are required for a project to attain FCDS, including the upgrades that get triggered by a group of projects: \***

No comments at this time.

**15. Additional comments on the IPE 2021 revised straw proposal and June 14, 2022, stakeholder workshop discussion particularly focused on any Phase 2 issues: \***

No comments at this time.