



Submit comment on Revised straw proposal

Initiative: Interconnection process enhancements 2021

[\[comments submitted electronically through CAISO portal\]](#)

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

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

CalWEA urges the ISO to bring back the existing TPD Allocation Group 3, which is reserved for actively queued projects to request TPD Capacity based on "Proceeding to Commercial Operation without a PPA.". Eliminating this group would deprive merchant generators of the opportunity to seek deliverability before they are operational because projects will typically not obtain a PPA or be built without deliverability. A compromise, such as requiring a PPA in the subsequent year to retain the TPD allocation, could be made to keep the allocation group viable.

With regard to the ISO's proposal on the emergency generation interconnection process, CalWEA urges the ISO to focus on helping projects already in the queue to complete development on time instead of creating new processes. If the proposal moves forward, CalWEA strongly urges the ISO to ensure the transparency of the process and prevent transmission owners from jumping the queue in a non-transparent way favoring their projects.

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 3 groups. As stated in the previous comments, CalWEA strongly recommends that the existing TPD Allocation Group 3 (reserved for actively queued projects to request TPD Capacity based on "Proceeding to Commercial Operation without a PPA") be maintained. In addition to several practical reasons, merchant generators should not be deprived of the opportunity to seek deliverability before they are operational because projects will typically not obtain a PPA or be built without deliverability. However, as a compromise, CalWEA proposes that the existing group 3 become the new group 4 with additional requirements such as requiring that the IC to have a PPA within a year to retain the allocation. The new group 4 would be any active interconnection request in the current queue cluster with a completed Phase II Interconnection Study that has not parked and elects to proceed without a power purchase agreement.

CalWEA also recommends that resources with PPAs shorter than 5 years should be able to get interim deliverability given that the shorter PPA does not qualify the resource for TPD allocation.

ISO clarified at the stakeholder call that ISP projects requesting FCDS could not seek TPD as EO before it completes the cluster deliverability assessment. CalWEA asks the ISO to reconsider this policy. Seeking TPD as EO does not constitute queue-jumping because the EOs seeking TPD are checked against the current queue to ensure they are not contributing to any local delivery constraints. ISPs that elect EO are currently allowed to seek TPD and that is not considered queue-jumping. There is no difference in the case of ISPs that elect FC and those seeking TPD as EO.

4. Provide your organization's comments on the ISO's proposal for developing an emergency generation interconnection process, as described in section 3.5: *

CalWEA opposes this queue-jumping exercise. Rather than creating this non-transparent process that favors PTOs, ISO should accelerate interconnection of ready projects already in the queue. If this proposal moves forward, the new process should not be allowed to be used by PTOs to develop their own projects. The criteria should require both NU and distribution upgrades to meet the cost threshold. The process should be transparent regarding the qualification of the eligible interconnection requests and how impacts of the emergency interconnection on the queued generation interconnection requests are determined.

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 4.2: a) General comments on site exclusivity topic. b) Provide your comments on the appropriate definition for demonstration of site exclusivity for offshore wind projects to be included in the ISO Tariff Appendix A. *

CalWEA supports the site exclusivity standard for offshore wind projects in federal waters governed by BOEM, but the standard should differ for projects in state waters. In the case of BOEM projects, the lease is issued first to the winning bidder, an EIR is then conducted, and then approval of a Construction and Operation Plan is considered. In State waters, a project submits an Application for Lease of State Lands to the State Lands Commission. After deeming the application complete, the Commission first conducts CEQA review on the proposed project and then determines whether to approve the lease application. (See State Lands Commission's Application Guidelines, available at https://www.slc.ca.gov/wp-content/uploads/2018/07/Lease_App_Guidelines_2011.pdf.) Therefore, CAISO should consider an application-deemed-complete as site exclusivity for state waters projects.

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 5.3: a. General comments on errors and omissions topic. b. Provide your comments on including the termination of the project's PPA within the eligibility criteria for allowing projects to withdraw and receiving a full refund of its IFS and any unused study deposit when an error or omission is discovered. i. What specific documentation of a project's PPA termination should be required? *

CalWEA supports the ISO proposal. CalWEA supports inclusion of PPA termination due to errors and omissions of a PTO within the eligibility criteria for project withdrawal and receiving a full refund of the IFS and unused study deposit.

7. Provide your organization's comments on the ISO's proposal for clarifying the definition of Reliability Network Upgrade (RNU), as described in section 5.4: *

CalWEA has no objection to the clarification.

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 5.5: *

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 5.6: *

CalWEA supports the ISO proposal provided that the study area boundary is defined and available publicly.

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 5.8: *

CalWEA supports the ISO proposal with modification. CalWEA recommends allowing downsizing while a project is parked.

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 has no objection to the ISO proposal but asks ISO to clean up Appendix B to remove unnecessary data requirements.

12. Provide your organization's comments on making it explicit that when ICs agree to share a gen tie-line, PTO interconnection facilities, and any related IRNUs at a substation across clusters, the shared IRNUs are not subject to GIDAP Section 14.2.2, as described in section 6.2: *

CalWEA believes that shared IRNUs should not be exempted from GIDAP 14.2.2 if the projects sharing upgrades have no affiliation with each other. There is enough protection for the PTO to keep the cost responsibility with the Interconnection Customers for shared IRNUs. No special treatment should be given for IRNU as PNU if the sharing parties are non-affiliated.

13. Provide your organization's comments on the ISO's proposal for modifications to commercial viability criteria, as described in section 6.4: *

CalWEA supports the modifications to commercial viability criteria. However, the ISO proposal does not address the concern CalWEA raised regarding interconnection before RNU. Timing of the limited operational study (5 months before the Initial Synchronization Date) does not leave enough time for project development. There should be a mechanism for the developers to get an indication whether the project can interconnect within two years. A non-binding LOS, as part of the Phase II operational study or annual reassessment, should evaluate if the projects with executed GIA can interconnect as requested by relying on market operation in lieu of some reliability upgrades. This analysis, including the assumptions, limitations, and conclusions, should be published and updated annually.

14. Provide your organization's comments on the ISO's proposal for expanding deliverability transfer opportunities, as described in section 6.6: *

CalWEA supports the ISO proposal.

15. 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 6.9: *

CalWEA supports the ISO proposal that only a Letter of Intent is required at the time of IR submission, as stated in the January 25, 2022, Revised Straw Proposal.

16. 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 6.10: *

CalWEA supports the ISO proposal.

17. Additional comments on the IPE 2021 revised straw proposal and February 1, 2022 stakeholder workshop discussion particularly focused on any Phase 2 issues. (Please do not re-submit comments on phase 2 issues unless they are new or provide additional clarity. Comments submitted on the Issue Paper and Straw Proposal phase 2 issues will be addressed and considered in the next Phase 2 issues proposals): *

CalWEA asks the ISO to reconsider the previously proposed changes to the Independent Study Process. The concern that the ISO has regarding accumulated impacts if relaxing Electrical Independence Test (EIT) is addressed by the overall ISP design. First, there are ISP eligibility criteria. Not all requests can meet the criteria. Second, performing the EIT requires the study results from the current cluster study or previous ISP study. Therefore, an ISP request can only be processed after the previous ISP study is completed. Third, the EIT also includes aggregated flow impact test. As the ISO tariff states, "the aggregate power flow test shall require that the aggregated power flow of the Generating Facility being tested, plus the flow of all earlier queued Generating Facilities currently being studied under the Independent Study Process that were tested against the transmission facilities described in the previous sentence, must be five (5) percent or less of those transmission facilities' capacity." Based on these factors, accumulated impact from many ISP requests should not be of concern.