



## Submit comment on zonal approach workshop

Initiative: Interconnection process enhancements 2023

### **1. Provide your organization's comments on data accessibility to inform and support the zonal approach**

As discussed in our January 9 comments, CalWEA believes that, without performing meaningful studies at the POI level, the zonal approach is flawed. The available transmission capacity should be determined during the cluster study. Then projects can be selected to fill out the transmission capacity before the cluster restudy.

CalWEA continues to support its "Proposal to Effectively Address the Queue Overload While Preserving Open Access, Competition, and Resource Diversity" as presented at the July 11, 2023, stakeholder meeting, with slight modifications, some of which are to conform to FERC's Order 2023 framework. We summarized this proposal in our January 9 comments.

### **2. Provide comments on additional data the ISO will be providing, i.e. list of substations within zone/interconnection area, workbook with studied POI behind each constraint, and TPD allocated behind each constraint.**

CalWEA generally supports CAISO making these data available. However, developers' ability to make use of such data depends on the timing of each step in the generation interconnection process. Without the details of how CAISO is going to change the process to comply with FERC Order 2023, it is difficult to comment. CalWEA urges CAISO to release the draft FERC Order 2023 filing as early as possible.

### **3. Provide comment on the information identified in the queue and planned upgrades to it.**

CalWEA supports the planned enhancements to the Queue Report and asks CAISO to implement them consistently. For example, CAISO already publishes the allocation group in the queue for most of the projects, but not all applicable projects.

### **4. Please provide comments on the examples provided to assess available capacity behind constraint(s) for studied POIs.**

CalWEA has no objection to the information being made available. However, CalWEA has the same comment as No. 2 above. In addition, CalWEA suggests that CAISO make transparent how it selects representative flow gates for each constraint. This could include a general methodology description in the BPM and reporting all the overloads in the cluster study reports.

### **5. Provide comment on the heatmap and ISO's proposal to provide a heatmap after annual TPD Allocation in addition to after Cluster Study and Restudy.**

## **As Submitted into CAISO's Comment Portal 1-16-24**

CalWEA requests that CAISO clarify two issues:

1. The heatmap is built from the most recent deliverability assessment case for the study area where the POI is located. How will it capture transmission constraints in other study areas that could be the worst constraint for the POI?
2. The base case used to show pre- and post-POI injection flows does not capture the stressed dispatch in the deliverability assessment. Therefore, the reported flows could be significantly lower than they would be in the cluster study. Could the heatmap be optimistically misleading?

### **6. Provide comment on ISO proposal to post redacted Appendix A reports on Market Participant Portal including additional information that should be considered confidential in the reports.**

CalWEA has no objection. However, CalWEA believes the best way to provide cost information that is meaningful for LSEs to determine project interest is to perform meaningful cluster studies. Then the projects can be more meaningfully ranked before the cluster restudy.

### **7. Please provide any additional comments on the zonal approach.**