



Submit comment on Final proposal and draft Tariff language

Initiative: Interconnection process enhancements 2023

1. Please share your organization's overall position on the final proposal:

CalWEA is very disappointed that CAISO proceeded with its plan to preserve the Cluster 15 (C15) deadline while anticipating nearly a year-long delay before those applications will be processed. As we explained in our March comments, we believe that delaying the deadline would have been a much more productive and efficient approach with no downside. Instead, we believe that CAISO's initial statement in the straw proposal that C15 applications may be "refreshed" before studies commence, combined with the suggestion that the next Interconnection Request (IR) window might not be opened until "warranted," drove developers to submit as many applications as they could, many likely very speculative. Thus, it is not a surprise that CAISO received nearly 550 applications. Worse, CAISO changed the IR rules just two business days before applications were due, preventing applicants from making any necessary changes to conform to the new rules, and presumably leading to the rejection of numerous applications. This totally chaotic process created havoc in the market, was difficult for developers, and was contrary to CAISO's tariff. CalWEA therefore continues to oppose these elements of the proposed tariff changes.

As for the balance of the proposal addressing the implementation of C15, additional clarity is needed, and we urge CAISO to reconsider the proposal to delay Independent Study proposals as discussed below.

2. Please provide a summary of your organization's comments on the draft Tariff language.

a. Needed clarifications:

- Please clarify when CAISO will publish the study timeline for C15.
- ISO proposes that when it resumes processing C15 interconnection requests, interconnection customers that submitted complete requests will have an opportunity to revise their interconnection request by making modifications without submitting material modification assessment requests, stating that "Any modifications made to an interconnection request must be received between May 1, 2024 and September 26, 2024 and must be determined to be complete based on all required information being supplied specific to the interconnection request prior to any validation work or scoping meeting for the project." Please explain the underlined portion of the statement, as it is unclear and not in the draft tariff language.
- CAISO proposes to allow various changes to IRs, including technology and capacity changes and storage additions if the original Interconnection Service Capacity is maintained. Please add detail regarding the process for submitting such modifications.

b. Independent Study Process

In the proposed tariff changes (although not mentioned in the proposal narrative), CAISO proposes not to accept/process Independent Study Process Interconnection Requests until Cluster 15 Phase I Interconnection Studies are completed, which, under the proposed schedule, is likely to be late 2025 or early 2026. While this is consistent with the current tariff, CAISO should propose tariff modifications to allow ISP projects to be studied based on C14 Phase 1 or Phase 2 studies. Since CAISO is taking the unusual step of pausing C15 studies for a year, contrary to its current tariff, it is only fair to allow ISP projects to move forward in the interim C15 period based on C14 studies.