



Submit comment on Issue paper and straw proposal

Initiative: Interconnection process enhancements 2021

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

California Community Choice Association (CalCCA) supports an alternative cost allocation treatment for network upgrades to local systems (below 200 kV) where the associated generation benefits more than, or other than, the customers within the service area of the Participating Transmission Owner (PTO) owning the facilities, as described in Section 9 below.

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, as modified in the stakeholder discussion that if a network upgrade only impacts that project, then the ISO would not need to wait for the reassessment to make a final decision on the downsizing:

3. Provide your organization's comments on the ISO's proposal for revising the Transmission Plan Deliverability (TPD) Allocation process, as described in section 3.3:

4. Provide your organization's comments on the ISO's proposal for addressing the question of how can the interconnection process and procurement activity align with transmission system capabilities and renewable generation portfolios developed for planning purposes, as described in section 3.4:

5. Provide your organization's comments on the ISO's proposal for determining if a solicitation model be considered for some key locations and constraints not addressed in portfolio development, as described in section 3.6:

6. Provide your organization's comments on the ISO's proposal for determining if an accelerated process for "Ready" projects be considered, as described in section 3.7:

7. Provide your organization's comments on the ISO's proposal for determining if higher fees, deposits, or other criteria be required for submitting an IR, as described in section 4.1:

8. 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:

9. Provide your organization's comments on the ISO's proposal for determining if the ISO should 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, as described in section 5.1:

CalCCA supports a cost allocation methodology that allocates costs to all those who receive benefits. As such, CalCCA supports re-considering an alternative cost allocation for network upgrades to local systems when the benefits extend beyond just those within the PTO service area in this initiative. To mitigate the risk that interconnection-related local network upgrades may create disproportionate impacts on a single set of ratepayers, the California Independent System Operator (CAISO) proposes to cap the percentage of interconnection-related network upgrade costs within each PTO's local transmission revenue requirement (LTRR). For any network upgrades that exceed the PTOs aggregate cap, interconnection customers would finance any network upgrades without reimbursement or move their generator interconnection to the high voltage system.¹ The CAISO's proposal to cap the percentage of interconnection-related network upgrade costs in each PTO's LTRR improves the current structure with respect to protecting local ratepayers from the cost impact of network upgrades that benefit all customers. However, the CAISO should describe how the proposal will treat upgrades that benefit all customers if they fall under the proposed cap. If the purpose of the network upgrades is for generation projects to be deliverable anywhere on the grid, then all customers benefit and should share the costs.

10. Provide your organization's comments on the ISO's proposal for determining the policy for ISO as an Affected System - how is the base case determined and how are the required upgrades paid for, as described in section 5.2:

11. 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:

12. 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:

¹ Interconnection Process Enhancements Issue Paper and Straw Proposal at 32-33.

13. 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:

14. Provide your organization's comments on the ISO's proposal for changing sites and POIs during IR validation, as described in section 5.6:

15. Provide your organization's comments on the ISO's various questions for addressing whether the ISO have the ability to terminate the GIA earlier than the seven year period, if a project cannot prove that it is actually moving forward to permitting and construction, as described in section 5.7:

16. 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, and if yes, what criteria should be required:

17. Provide your organization's comments on the added scope item from SCE to add due dates for curing deficiencies in Appendix B, to avoid delays in starting Phase II studies, as described in section 6.1:

18. Provide your organization's comments on the added scope item from SCE to make 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 6.1:

19. Provide your organization's comments on the added scope item from Gridwell on a proposal to include an issue focused on improved transmission grid data transparency, and specifically what data your organization would like to obtain publically, as described in section 6.2:

20. Provide your organization's comments on the added scope item from LSA/SEIA to resolve delays caused by PTOs via modifications to commercial viability criteria, as described in section 6.3:

21. Provide your organization's comments on the added scope item from LSA/SEIA to address network upgrade re-stacking and how your organization would suggest the Participating TOs would prioritize the various upgrades versus project CODs, as described in section 6.3:

22. Provide your organization's comments on the added scope item from LSA/SEIA to address expanding deliverability transfer opportunities, as described in section 6.3:

23. Provide your organization's comments on the added scope item from CalWEA to address re-examining the ISP electrical independence test in section 6.4 and provide specific proposals for revisions to the ISP electrical independence test criteria that provides a methodology that addresses the condition where a current cluster project is impacted or a potential impact cannot be ruled out:

24. Provide your organization's comments on the added scope item from REV Renewables to address 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, as described in section 6.4:

25. Provide your organization's comments on the added scope item from SDG&E 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:

26. Provide your organization's comments on the added scope item from SDG&E 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 6.4:

27. Additional comments on the IPE 2021 issue paper and straw proposal and December 13, 2021 stakeholder workshop discussion: