

California Community Choice Association

SUBMITTED 10/04/2022, 02:13 PM

Contact

Shawn-Dai Linderman (shawndai@cal-cca.org)

1. Please provide a summary of your organization's comments on the IPE 2021 phase 2 final proposal:

The California Community Choice Association (CalCCA) supports the California Independent System Operator's (CAISO's) proposal regarding the Transmission Plan Deliverability (TPD) allocation process. This includes (1) requiring projects have power purchase agreements (PPAs) of a minimum 5-year term to be eligible for a TPD allocation and (2) requiring non-load serving entity (LSE) procurement entities to demonstrate a resource adequacy (RA) contract with an LSE, or post a deposit in lieu of an RA contract, to be eligible for a TPD allocation.

Regarding the CAISO's proposed transparency enhancements, CalCCA continues to request the CAISO publish whether or not a PPA has been executed and the MW amount of the PPA when the CAISO has such information. CalCCA understands that the CAISO does not always have complete information when it comes to whether or not a project has a PPA, because the CAISO only obtains PPA status information if the project needs to meet commercial viability criteria or retain deliverability.^[1] However, to the extent the CAISO does have the PPA status information, the CAISO should provide it. The CAISO could also allow projects to voluntarily make the PPA status available. In its comments to the Revised Straw Proposal, the California Public Utilities Commission (CPUC) Energy Division Staff indicate that PPA statuses are *sometimes* disclosed in other forums but "not easily cross referenced with the CAISO queue."^[2] The ability to identify the PPA status of projects in the queue will aid in LSE procurement efforts necessary to bring new resources online to meet IRP procurement orders.

[1] CAISO Interconnection Process Enhancements Final Proposal at p. 8: <http://www.caiso.com/InitiativeDocuments/FinalProposal-InterconnectionProcessEnhancements2021Phase2.pdf>

[2] California Public Utilities Commission Energy Division Comments on the Revised Straw Proposal (submitted July 8, 2022): <https://stakeholdercenter.caiso.com/Comments/AllComments/47c8ab46-0fe6-41ad-9d69-8d7ac894fd5b#org-6f43867a-ad73-4743-ad54-1d97eba834fa>

2. Provide your organization's comments on section 3.1 - Transparency enhancements:

CalCCA has no additional comments at this time.

3. Provide your organization's comments on section 3.2 - Revisiting the criteria for PPAs to be eligible for a Transmission Plan Deliverability (TPD) allocation:

CalCCA has no additional comments at this time.

4. Provide your organization's comments 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:

CalCCA has no additional comments at this time.

5. Provide your organization's comments on section 5.2 - Policy for ISO as an Affected System – how is the base case determined and how are the required upgrades paid for:

CalCCA has no additional comments at this time.

6. Provide your organization's comments on section 5.2 - 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:

CalCCA has no additional comments at this time.

7. Provide your organization's comments on section 6.1 - 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:

CalCCA has no additional comments at this time.