

California Community Choice Association

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Contact

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

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the California Independent System Operator's (ISO) Interconnection Process Enhancements 2023 Final Proposal. This initiative is coming at a critical time when the entire industry is moving as quickly as possible to get new clean resources online. CalCCA's comments on the Issue Paper/Straw Proposal highlight the urgent need to interconnect resources at an unprecedented pace to meet California's ambitious climate goals.[\[1\]](#)

Track One focuses on near-term schedule changes delaying the study of new interconnection requests. While it is unfortunate to delay the interconnection process at a time when the need for new resource interconnection is at its highest, CalCCA understands the ISO's need to delay the study of Cluster 15 interconnection requests, given the record amount of requests moving from Phase I to Phase II. CalCCA anticipates that Track Two of this initiative will bring about the "significant and transformative improvements"[\[2\]](#) the ISO seeks. In Track Two, the ISO must consider policies that will allow the ISO to support the number of requests the ISO has experienced in Cluster 14 and anticipates in Cluster 15 going forward. The amount of build-out projected by the California Energy Commission in its Senate Bill (SB) 100 scenarios and planned for in the ISO's Transmission Plan will necessitate efficient queue management that supports the magnitude of requests in Cluster 14 without further delays and supports fluctuating queue sizes year over year.

The following Track One proposals appear reasonable given the delay between when Cluster 15 interconnection requests were submitted (April 2023) and when the ISO will begin validating those requests (April 2024):

- Allowing interconnection customers that withdraw prior to April 1, 2024 to receive a refund of any portion of the interconnection customer's study deposit that exceeds costs that the ISO, Participating Transmission Owners, and third parties have incurred on the interconnection customer's behalf (which the ISO expects to be minimal); and
- Allowing the interconnection customer to make certain modifications to their request, including changing the technology type, changing the megawatt amounts of the various generator technologies or adding battery storage as long as the original interconnection capacity in the request does not increase, or changing the point of interconnection within the same study area, before their request is validated (by Sept. 2024).

CalCCA also supports the ISO's determination to not provide a special schedule for offshore and out-of-state wind. Offshore and out-of-state wind resources can play important roles in meeting state policy goals. As stated in CalCCA's opening comments,

however, CalCCA would be concerned with using a special study schedule for offshore and out-of-state wind if it would impact the study schedule of Cluster 15, and therefore, delay the interconnection of other projects needed to meet procurement orders. CalCCA agrees with the ISO that because policy-driven transmission projects for offshore wind and out-of-state wind are expected to be included in the 2023-2024 Transmission Planning Process cycle, studying offshore wind and out-of-state wind in Cluster 15 with the other projects makes the most sense.

[1] CalCCA Comments on the Issue Paper Straw Proposal: “From 2001 through 2021, the state has built new capacity at a rate of 1,308 MW per year. Under the SB 100 Core Scenario, the rate will need to increase to 7,292 MW per year from 2022 through 2045 (a 557 percent increase).” <https://stakeholdercenter.caiso.com/Comments/AllComments/b6ed131c-ecaa-460d-8316-e0e0dcd0373f#org-7f69761d-1e42-4add-9794-d8d20a05431d>.

[2] Final Proposal at 1.

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

CalCCA has no comments on the draft tariff language at this time. The language appears consistent with the policy in the Final Proposal.