

California Community Choice Association

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Contact

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

1. Please provide your organization's comments on the Interconnection Process Enhancements (IPE) 2023 Track 2 Final Proposal:

Please specify which section of the proposal your comments address.

The California Community Choice Association (CalCCA) appreciates the opportunity to comment on the IPE 2023 Track 2 Final Proposal, the work product resulting from extensive efforts put forth by the CAISO and stakeholders to better enable the rapid deployment of new generation. CalCCA supports many elements of the Final Proposal, including:

- The zonal approach to prioritizing interconnection to areas with available or planned transmission capacity;
- Utilizing scoring criteria to prioritize interconnection requests with the zones to the ones that are most ready to move forward;
- The makeup of the scoring criteria, specifically (1) the commercial interest criteria which will allow load-serving entities (LSE) to provide input into the prioritization based upon their needs, preferences, and integrated resource plans, and (2) the system need criteria which will ensure a diverse resource portfolio advances through the interconnection queue; and
- Enhancements to the queue management process, in particular, the revised viability and time in queue requirements that will provide an equitable and reasonable time projects can remain in the queue without reaching certain milestones.

As the CAISO is implementing the interconnection request intake and scoring criteria process, it should strongly consider modifying the timeline for LSE submittal of their commercial readiness scores. The CAISO indicates LSEs will have ten calendar days following interconnection request submittals to submit their scores. This is a very tight turnaround and will likely be insufficient for LSEs to accurately match project information received via LSE requests for information (RFI) with submitted interconnection requests. While the CAISO suggests it needs to limit the time between interconnection request submittal and LSE scores to align with deadlines from FERC, it is not clear that providing LSEs with one month to provide their scores would interfere with these deadlines. This is because (1) LSEs will finalize their Cluster 15 interconnection requests on December 1, 2024, (2) the CAISO will begin reviewing interconnection requests on January 1, 2025, and (3) applicants can withdraw interconnection requests by January 1, 2025, for a full refund. Given these deadlines, it seems LSEs should at least have roughly one month to submit their scores (i.e., from December 1 to January 1). The CAISO should also aim to provide LSEs with a list of interconnection requests detailing the project name, technology, point of interconnection (POI), and megawatts (MW) as soon as requests are submitted on December 1. LSEs will need to finalize their scores after seeing the entire set of interconnection requests, rather than only seeing subsets of proposed projects that responded to individual LSE RFIs. As proposed, the timeline for LSE scoring will result in rushed evaluations based on incomplete knowledge. For LSE scoring to be useful it should be based on the best available information, which would include seeing a complete set of the interconnection requests with project details provided to LSEs by CAISO.

The CAISO should also monitor the 150 percent sub-zonal constraint limit that the CAISO would use to limit the number of projects studied in each zone, to ensure the 150 percent limit supports the pace of build required to meet Senate Bill (SB) 100 (De León, Chapter 312, Statutes of 2018) targets. CalCCA estimates a need for over 6,000 MW of new resource interconnection per year to reach SB 100 targets by 2045.^[1] The CAISO's test run of the constraint analysis using Cluster 15 projects and study results indicates that of the 508 interconnection requests submitted, only 200 of 508 requests were eligible to proceed to scoring based on an initial constraint check. It appears the CAISO found the 308 projects ineligible because they were located in areas with no available transmission capability. After scoring the 200 requests until the CAISO reached 150 percent of each constraint, the CAISO was left with 112 requests that it would study. While it is unclear the number of MW associated with the 300 requests that were ineligible or the 112 requests that would have moved on to the study process, the results of this test could be concerning if it reveals the available interconnection capacity is not

keeping pace with the need. If the 150 percent limit restricts the capacity associated with studied interconnection requests in a way that does not keep pace with needs, this could highlight issues with the process for advancing policy-driven transmission to support generation interconnection. The CAISO should monitor the amount of capacity that advances to the study process under the zonal approach to ensure resource planning, transmission planning, and the interconnection process support the need for new capacity on the system.

[1] 2001-2022 [Electric Generation Capacity and Energy? California ISO 2023 Year in Review](#) less [2023 retirements list?](#) and [SB100 Joint Agency Report](#) Assumes straight line growth between 2024 and 2045.

2. Provide your organization's feedback on the proposed timeline for Track 3 of the IPE 2023 initiative, which focuses on the Transmission Plan Deliverability Allocation process:

The ISO would like your feedback on extending the initiative timeline by targeting the October 3, 2024 ISO Board of Governors meeting for decision.

CalCCA supports the CAISO's proposed timeline for initiating Track 3 but recommends flexibility regarding the timeline for bringing Track 3 proposals to the CAISO Board of Governors. Deliverability allocation is a key issue that requires review. Resource Adequacy (RA) capacity is extremely scarce, and enhancements such as the conditional deliverability approach considered in the Generator Deliverability Review initiative could expand the RA supply stack at a time when it is much needed. Therefore, the CAISO's proposal to start Track 3 shortly after the conclusion of this Track 2 process is prudent. Beginning the stakeholder process this spring and targeting a July 2024 CAISO Board of Governors meeting would result in a very expedited stakeholder process. As the stakeholder process evolves, the CAISO should be open to extending the initiative timeline as long as the extension does not impact the timeline for Cluster 15 TPD allocation.

3. The ISO is seeking stakeholder feedback on the effectiveness of its recently adopted working group process and its overall contributions to the IPE 2023 proposal development process. We would greatly appreciate your responses to the following survey by end of day April 18, 2024: <https://www.surveymonkey.com/r/YHWNWC2>

Please leave the below text box blank. All responses to the survey will be kept anonymous.