Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the 2018 IPE stakeholder initiative Issues Paper posted on January 17, 2018.

Submit comments to InitiativeComments@CAISO.com

Comments are due February 7, 2018 by 5:00pm

The issue paper posted on January 17, 2018 and the presentation discussed during the January 24, 2017 stakeholder meeting can be found on the CAISO webpage at the following link: http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx

Please use this template to provide your written comments on the Issue Paper topics listed below and any additional comments you wish to provide. The numbering is based on the sections in the Issue Paper for convenience.

Golden State Clean Energy (GSCE) appreciates the opportunity to provide comments on the proposed topics for the CAISO's 2018 Interconnection Process Enhancements Initiative. We look forward to engaging with the CAISO and other stakeholders on these critical topics to address issues in the interconnection and deliverability allocation procedures.

About Golden State Clean Energy

Golden State Clean Energy is a renewable energy developer, currently developing the Westlands Solar Park (WSP), a 20,000+ acre and 2,700MW competitive renewable energy zone development in the southern part of the Westlands Water District in the Central Valley of California. This competitive renewable energy zone was identified by the State of California in the Renewable Energy Transmission Initiative as a zone that holds the greatest potential for cost-effective and environmentally responsible renewable development. This project has strong support from environmental and agricultural stakeholders, as it is located entirely on drainage-impaired farmland and sited adjacent to existing transmission corridors that can deliver renewable power to both the northern and southern parts of California. This support has led to the success of the project in obtaining a programmatic Environmental Impact Report for the project, approved just recently.[1] GSCE has been an active participant in the California Independent System Operator's interconnection process under the Westlands Solar Park name and currently has 1,170 MW of generation in the CAISO's interconnection queue.

Golden State Clean Energy offers comments on the following topics:

4. Deliverability

4.1 Transmission Plan Deliverability Allocation

GSCE supports the idea that projects should be allocated TPD as they receive PPAs and not be forced to convert to energy-only following a year of parking. Having deliverability is a critical component of marketing a project and the current rules are too restrictive in their misalignment with procurement timelines and market realities. The current stall in procurement has led to the unintended consequences of more projects being forced to energy-only when they do not qualify for an allocation of deliverability. While we believe that the extended parking proposal currently before FERC is an important step towards addressing this issue, and we appreciate that the CAISO has committed to evaluating a more long-term solution.

[1] Final Program EIR on Westlands Solar Park Master Plan and Gen-Tie Corridors Plan available at http://wwd.ca.gov/news-and-reports/environmental-docs/.

4.2 Balance Sheet Financing

GSCE does not believe this should be included in the scope of this initiative. This is already an onerous process and no further changes should be made. A project should be able to make this election, as an interconnection customer is risking a large amount. GSCE does not support the elimination of this option.

4.3 Participating in the Annual Full Capacity Deliverability Option

GSCE supports the inclusion of this topic in the scope of the initiative and we look forward to working with the CAISO on what additional criteria may be appropriate. The process already privileges later queued projects and GSCE wants to ensure that projects returning for deliverability are given a fair opportunity to receive an allocation of deliverability.

4.4 Change in Deliverability Status to Energy Only

GSCE supports the inclusion of this initiative and believes the change to energy-only should be available at any time.

4.5 Energy-only Projects' Ability to Re-enter the CAISO Queue for Full Capacity

GSCE supports inclusion of this initiative and agrees that projects achieving COD with energy-only or partial deliverability status should be able to re-enter the queue.

4.6 Options to Transfer Deliverability

4.7 Transparency on Availability of Deliverability

4.8 Commercial Viability Criteria – Continuous Compliance Obligation

4.9 Interim Deliverability Status

4.10 Effective Load Carrying Capacity

4.11 Cancellation or Delay of CAISO Approved Transmission Projects

GSCE agrees with LSA that that generator deliverability should be explicitly included in decisions to delay or cancel transmission projects approved under the TPP. These delays have significant effects on projects by delaying their ability to get FCDS and may have negative consequences on the PPAs when generators are unable to meet terms they otherwise reasonably expected to meet. GSCE also supports

an additional mechanism for providing notice to interconnection customers of resulting impacts.

5. Energy Storage

5.1 Distributed Energy Resources

5.2 Replacing Entire Existing Generator Facilities with Storage

GSCE asks the CAISO to address this topic in broader framework. At the meeting, the CAISO discussed the case-by-case analysis that takes place when an interconnection customer seeks to convert part of their project to storage. We ask that the CAISO provide more transparency regarding under what conditions this is acceptable and to evaluate additional possibilities for these types of conversions.

5.3 Deliverability Assessment for Energy Storage Facilities

6. Generator Interconnection Agreements

6.1 Suspension Notice

6.2 Affected Participating Transmission Owner

6.3 Clarify New Resource Interconnection Requirements

6.4 Ride-through Requirements for Inverter based Generation

6.5 Affected System Options

6.6 Modeling Data Requirements

7. Interconnection Financial Security and Cost Responsibility

7.1 Maximum Cost Responsibility for NUs and Potential NUs

7.2 ITCC for Non-cash Reimbursement Network Upgrade Costs

7.3 Financial Security Postings and Non-Refundable Amounts

GSCE asks the CAISO to address this topic in the 2018 IPE. The current procurement landscape has limited the ability of interconnection customers to sign PPAs in the short amount of time allowed for

projects to be eligible to receive deliverability. With more forced conversions to energy-only due to lack of deliverability, generators are often forced to withdraw and forfeit substantial amounts of security postings. Interconnection customers have posted these funds in the form of private at-risk capital to meet California's ambitious renewable portfolio standards. Requiring high forfeiture amounts punishes these interconnection customers for conditions outside of their control.

7.4 Queue Clearing Measures

7.5 Shared SANU and SANU Posting Criteria Issues

7.6 Clarification on Posting Requirements for PTOs

7.7 Reliability Network Upgrade Reimbursement Cap

7.8 Reimbursement for Network Upgrades

8. Interconnection Request

8.1 Study Agreement

8.2 Revisions to Queue Entry Requirements

GSCE continues to believe that the CAISO should address potential higher barriers to entry and appreciates the CAISO's requests for specific proposals that would meet the limitations set by FERC.

8.3 Master Planned Projects (Open Ended and Serial Projects)

GCSE requests that the CAISO include this issue in the 2018 IPE. We believe that doing so may encourage the planning of other master-planned projects that will provide benefits to the system and to ratepayers and encourage more environmentally-beneficial development decisions. Master planning renewable energy zones can significantly de-risk any renewable development located in these areas, reduce stranded assets, and promote orderly and efficient infrastructure development aligned with market conditions. Projects that are part of master-planned developments provide efficiencies and value to buyers and ultimately the ISO in that they are not as subject to the cost and uncertainty of permitting issues. The ability to phase development and interconnections for projects in master planned areas is important and we urge the CAISO to reconsider including this in the scope of this year's IPE.

Where the State of California has spent time and energy to develop renewable energy development zones and portfolios based on those zones, the CAISO's interconnection processes should account for this work and remove any barriers to planning and developing transmission to these master planned areas to meet the state's RPS goals. California's Renewable Energy Transmission Initiative (RETI) evaluated ideal locations for renewable development in California in order to identify major upgrades to the electric transmission system. The results from RETI are being used as inputs into the CPUC's Integrated Resource Planning proceeding, which will drive procurement from the IOUs through its System Reference Plan. Projects that are part of a CREZ are almost guaranteed to be built out and should be studied differently. The CAISO should recognize and give priority to streamlining the process for projects that are part of these zones since they have already been deemed valuable by the CPUC. This process in a different form was highly successful in helping the build out of the Tehachapi wind resource area and could similarly be used for other highly supported resource areas in an era where very long-term planning should be encouraged to help meet state mandates, not discouraged.

8.4 Project Name Publication

8.5 Interconnection Request Application Enhancements

8.6 FERC Order No. 877

9. Modifications

9.1 Timing of Technology Changes

9.2 Commercial Viability – PPA Path Clarification

9.3 PPA Transparency

9.4 Increase Repowering and Serial Re-Study Deposit

9.5 Clarify Measure for Modifications After COD

9.6 Short Circuit Duty Contribution Criteria for Repower Projects

9.7 Material Modification for Parked Projects

10. Additional Comments