



## Stakeholder Comments Template

### Generator Interconnection: Cluster 14 Revised Study Process and Timeline

This template has been created for submission of stakeholder comments on the Supercluster Interconnection Procedures issue paper and draft final proposal that was published on May 14, 2021. The proposal, stakeholder meeting presentation, and other information related to this initiative may be found on the miscellaneous stakeholder meetings webpage at:

<http://www.caiso.com/informed/Pages/MeetingsEvents/MiscellaneousStakeholderMeetings/Default.aspx>

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **May 28, 2021**.

Submitted by	Organization	Date Submitted
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**Please provide your organization’s comments on the Supercluster Interconnection Procedures issue paper and draft final proposal, and May 21 stakeholder call discussion:**

ACP-California appreciates CAISO’s efforts to address the Cluster 14 “supercluster” by proposing a solution that seeks to provide interconnection customer certainty with a proposal to establish a trigger for withdrawal without forfeiture of financial security.

ACP-California urges CAISO to be as surgical as possible with the changes that are needed on an urgent basis, and to reserve all other revisions for further evaluation and discussion in the upcoming Interconnection Process Enhancements (IPE) initiative. Limiting the scope and impact of changes in this Supercluster Interconnection Procedures initiative will improve customer certainty and deferring more significant revisions for the IPE initiative will allow for a more robust and thoughtful stakeholder process, reducing customer uncertainty and minimizing market implications.

We suggest that CAISO only address time-sensitive issues now, such as the study timeline and the Phase I study scope. Other issues, including whether to hold an open window next year, how the financial security cap will work, and whether to institute a standing rule applicable to future “superclusters,” could be addressed in the planned IPE initiative. CAISO should also leave the door open for IPE to explore additional

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modifications for Cluster 14, should they prove to be necessary. The upcoming IPE initiative should also consider additional modifications for future clusters (15 and beyond). Further refinement to the interconnection procedures through IPE will be necessary to help reduce the potential for superclusters in the future.

ACP-California also invites continued discussions and exploration with the CAISO team and stakeholders on whether there might be policies that could be put in place to allow mature projects in Cluster 14, which can come online by early 2024, to maintain the typical cluster schedule. While this would create complications and requires additional policy discussion, given the near-term procurement needs of the state, continued exploration of this type of an option may be warranted.

ACP-California also requests that as CAISO, in coordination with the PTOs, works through the study scenarios and dispatch assumptions for the steady state analysis, that as much transparency and stakeholder processes as possible be incorporated into those decisions. We recognize that this stakeholder initiative, which is on an expedited timeline, is not the appropriate place for such discussions. We encourage CAISO to hold stakeholder workshops over the next several months to review proposed assumptions and gather stakeholder feedback; this will help make the Phase I studies more meaningful and useful and is, therefore, worth the additional effort to complete.

Finally, ACP-California reiterates requests that were made on the stakeholder call for CAISO to provide additional information to stakeholders on the availability of deliverability across the system. We appreciate that CAISO is already evaluating how to provide this type of information in a digestible form, and we look forward to working with CAISO to develop the best approach to providing this information.

ACP-California appreciates CAISO's efforts to address the Cluster 14 "supercluster" and looks forward to continuing to work with CAISO on this initiative and on the future IPE initiative to help continue to improve the CAISO's interconnection processes and allow for new resources to come online in a timely manner.