



## 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.aiso.com/informed/Pages/MeetingsEvents/MiscellaneousStakeholderMeetings/Default.aspx>

Upon completion of this template, please submit it to [initiativecomments@aiso.com](mailto:initiativecomments@aiso.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:**

Aypa Power appreciates the opportunity to provide feedback on the Cluster 14 Supercluster Interconnection Procedures issue paper. Aypa understands the magnitude of the problem CAISO is experiencing and appreciates the effort put forward by CAISO to process the C14 supercluster in a timely and reliable manner. Aypa has invested in a multi gigawatt portfolio in the C14 supercluster and is submitting the following comments and recommendations to help process the cluster in a timely and reliable manner.

**Resource Management**

CAISO in its paper has stated that neither the Transmission owners nor CAISO are able to increase staffing levels to mitigate the supercluster impact. Based on the complexity of the studies and the sheer volume of requests, Aypa strongly encourages that CAISO hire additional engineering staff or external support to help with the timely processing of the queue. Interconnection customers have invested millions of dollars in development capital and a timely processing of the interconnection queue is prudent for projects to achieve commercialization to meet California state goals.

**PTO by PTO Basis for Study Results**

Aypa appreciates CAISO’s philosophy around simultaneous publication of results and uniform treatment of projects within different sub regions. With the advent of the new supercluster, we recommend CAISO take a sub-region approach to processing timelines in line with the same methodology of how it plans to dispatch and analyze the queue projects. If there are projects within a region that has interconnection capacity and can be processed at a faster pace, CAISO should consider doing so. Projects in areas of persistent congestion should not be holding down the entire queue. We strongly encourage CAISO to consider a sub-regional approach towards queue processing. We do not believe it results in any unfair advantage to customers in areas of existing transmission capacity. Today a project that has low scope of work for upgrades can achieve commercialization quicker than projects waiting for long-lead work, the sub-region queue processing would be no different.

**Phase 1 Study**

Aypa supports CAISO’s proposal for a reduced scope phase 1 study, although it is not clear why a reduced scope will take more time to process even with a significant sized supercluster. We understand that model building, analysis and cost allocation of mitigations are complicated and time consuming, but with the reduced scope we expect CAISO to maintain its original timeline of phase 1 completion. Aypa recommends CAISO explore further reduction of the scope for phase 1 and a possibility of limiting the scope to a thermal analysis alone to help accelerate withdrawal of non-ready projects. If projects are not ready to accommodate thermal mitigations, they surely are not ready for additional voltage and stability upgrades.

**Cost Caps and Initial Interconnection Financial Security**

Aypa appreciates CAISO’s proposal to establish cost caps in Phase II as the results will cover the total scope of the system impact study and provide a more accurate estimate of the total interconnection costs, but we are also weary of the refundability provisions around Phase 1 IFS posting. Aypa believes the refundability provision will encourage non ready projects to stay longer in the queue in the anticipation of reduced network upgrade cost and will introduce additional uncertainty and churn to Phase II results. Aypa recommends that CAISO removes the proposed refundability provisions around Phase 1 IFS posting based on phase II results.

Aypa also recommends that CAISO maintain the existing IFS maximums.

We commend CAISO’s efforts in balancing risk, certainty and exposure to all customers and stakeholders involved in the queue process and appreciate the opportunity to provide comments.

Sincerely,

Swaraj Jammalamadaka

CTO, Aypa Power

