



**Comments of First Solar, Inc., on  
California ISO's 2020 Revised Draft Policy Initiatives Catalog  
August 28, 2019**

First Solar, Inc., submits these comments on the California ISO's 2020 Revised Draft Policy Initiatives Catalog dated August 15, 2019. In July, First Solar submitted suggestions for two initiatives, one related to energy-only issues and the other related to concerns with the category of "deliverability-triggered" reliability network upgrades.

First Solar appreciates CAISO including a new interconnection process enhancements initiative as a discretionary initiative in the 2020 Revised Draft Policy Initiatives Catalog. The dynamics on the grid continue to shift as California responds to the policies that are driving more renewable resources onto the system. These dynamics lead to a need to examine whether the rules are working to support the commercial side of renewable project development. Ensuring a reasonable balance between the responsibilities of generation developers, utilities and ratepayers to support a sustainable framework for cost-effective development is challenging. Because the time to examine the issues, implement the new rules and embed the changes into the interconnection and transmission planning processes can be extensive, we urge CAISO to prioritize the interconnection process enhancements initiative for 2020. We recognize that CAISO made significant revisions to its interconnection processes in 2018 and that implementation of those revisions continues into 2019. Starting a new initiative mid-year next year would allow some break while still making progress towards addressing these additional issues next year.

We also appreciate CAISO's response to the energy-only initiative suggestion and agree that elements of the energy-only issue are being examined in some fashion in a number of initiatives and proceedings at the CAISO and CPUC. We remain concerned, however, that the topic of energy-only projects and how they fit into the plan for California's renewable fleet in a way that supports their commercial viability if California is going to count them to support GHG reduction policies, is not being examined holistically. We urge CAISO to continue to consider how it might tee up a comprehensive examination of energy-only issues.

Thank you for your consideration of these comments.

Sincerely,

*Patricia Englin*

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