



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. 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:

GLW generally supports the CAISO’s proposal to address the large number of cluster 14 interconnection requests. GLW is concerned, however, about how the revised timeline requirements may impact the mid-term reliability resources anticipated by the CPUC. Therefore, GLW urges the CAISO to pragmatically examine ways that may permit resources in cluster 14 to contribute to meeting the mid-term reliability needs to the extent possible consistent with the overall modifications to cluster 14. In particular, the CPUC’s recently published proposed decision in R.20-05-003 identifies a need the “firm” category of resources, i.e., 85% capacity factor, to achieve preferred commercial operation by 2026.

If the CAISO uniformly delays cluster 14 interconnection studies, it is less likely that any of the resources in this queue that satisfy the more specific firm requirements will be able to be online by 2026. GLW recommends that the CAISO accelerate the studies for any such resources to support the

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mid-term reliability requirements. We would hope that the CAISO would consider least regret projects in its 2021/22 TPP that would aid in the integration of these cluster 14 resources – especially resources capable of satisfying the CPUC-proposed mid-term reliability requirements such as reliable, flexible, renewable resources.

Consistent with the foregoing, GLW is not opposed to the release of PTO study results as they become available. While such a policy may create some potential for inconsistent timing of study results for interconnecting parties, GLW believes that the benefits may outway any risks of competitive positioning in contracting as a result of variation in time. GLW is also willing to defer to the position of the load-serving entities on this topic.