

LSA Comments on 2017 Expedited GIDAP Enhancements and Interconnection Request Window & Validation Timelines Proposals

The Large-scale Solar Association (LSA) hereby submits these comments on the July 24th document, 2017 Expedited GIDAP Enhancements – Draft Issue Paper & Straw Proposal (Proposal), and the August 4th stakeholder meeting to discuss the Proposal. The Proposal would do the following:

- **Allow cluster-study projects to “park” for one additional year**, under these conditions:
 - **There is Resource Adequacy (RA) deliverability available in the project area.** The Proposal assumes that this is necessary for deliverability awards after the additional year. (It acknowledges that dropouts of earlier-queued projects could free up deliverability afterwards but says “that result has occurred so infrequently in the past that the CAISO does not believe that it is prudent to allow projects to remain parked on the hope that it could happen.”)
 - **Network Upgrades (NUs) assigned to the project are not needed by later-queued projects.** If a project withdraws from the queue after executing a Generator Interconnection Agreement (GIA), Participating Transmission Owners (PTOs) and not later-queued projects must fund any NUs in the GIA that are still needed. The Proposal expresses concern that, since parked projects have not yet executed GIAs, this protection for later-queued projects would not be available.

The CAISO will consider whether this change should be permanent, as well as other GIDAP changes, in the planned Interconnection Process Enhancement (“IPE 2018”) initiative.

- **Revised the Interconnection Request (IR) submission/validation schedule**, as shown.

| <i>PROCESS STEP</i> | <i>CURRENT SCHEDULE</i> | <i>PROPOSED SCHEDULE</i> |
|--|---|---|
| IR Submission | April 1 st -30 th | April 1 st -15 th |
| IR Validation | 20 BDs after submission close | May 31 st |
| Study Agmt. to Interconnection Customer (IC) | 30 CDs after submission close | May 31 st |
| Scoping Meeting held | 60 CDs after submission close | June 30 th |

The CAISO offered the following reasons for this proposal at the stakeholder meeting:

- **Nearly all IRs are submitted in the last week of the current window.** For Clusters 9 and 10 (the most recent clusters): (1) No IRs were submitted in the first two weeks; and (2) 80% and 94% of IRs, respectively, were submitted in the last week of the window.
- **The CAISO, PTOs, and ICs are having problems completing the IR validation process under the current schedule**, “given the increasing complexity of technical reviews and site exclusivity.” Modeling data validation has been a particular problem.

Summary of LSA comments

- LSA supports the “parking” extension but believes that: (1) It should be at least two years; and (2) the proposed eligibility conditions are too restrictive.
- LSA supports the proposed IR interconnection/validation revisions.

These comments are explained further below.

Parking proposal – additional parking time

LSA believes that the CAISO's one-year parking limitation is too restrictive. As the Proposal notes, many competitive procurement solicitations require the equivalent of a Phase II Study, and there is not enough time between issuance of a Phase II Study and initial deliverability awards to acquire the Power Purchase Agreement (PPA) needed to qualify for such awards. Irregular utility procurement timing exacerbates the problem.

The CAISO's recognition of the problem, as reflected in the one-year proposed parking extension, are most welcome. However, the extension should be at least two years.

These projects are otherwise likely to be viable, having already made Interconnection Financial Security (IFS) postings. They would be logical PPA candidates for Load-Serving Entity (LSE) procurement to meet the 50% Renewables Portfolio Standard (RPS), if they can stay in the queue long enough for those procurement efforts to commence.

However, CPUC-jurisdictional Load-Serving Entities (LSEs) are likely to be unable to commence that procurement until after completion of the current Integrated Resource Planning (IRP) proceeding, and submission/review/approval/implementation of procurement compliance plans.

Realistically, it will probably be 2019 or 2020 before large-scale 50% RPS procurement can begin, and the CAISO should recognize that. Moreover, the CAISO's "IPE 2018" initiative – where the CAISO will consider this and other parking issues – is unlikely to conclude before late 2018 at the earliest, and approval of the resulting policies may stretch well into 2019.

There is little apparent harm in allowing at least one more parking year, to March 2020 for Cluster 8. LSA understands that this could raise or exacerbate issues related to contingent cost allocations, a topic that LSA intends to raise in the IPE 2018 initiative, but we believe that this additional year will be needed to prevent withdrawal of these otherwise-viable projects.

LSA comments on parking proposal – proposed conditions

LSA believes that the CAISO's proposed conditions are too restrictive.

First, while it may be "infrequent," there is still a possibility that queue dropouts will free up deliverability in areas where none may exist when the first parking year expires. There is no harm in allowing projects to remain in the queue for that additional year if they so choose.

Second, if upgrades are needed for later-queued projects, parking-extension disqualification is too blunt a tool for that situation. For example, if those later-queued projects need an upgrade but have CODs that can tolerate the additional year, there is no reason not to allow it. Moreover, those upgrades may not be needed until the parked projects come on-line.

Thus, the CAISO should not apply this condition as a "blanket" criterion but should consider more narrow rules of thumb or situational analyses.

LSA comments on IR submission/validation process and schedule

LSA does not oppose CAISO proposals for IR submission and validation, for the reasons in the Proposal and discussed at the meeting. However, LSA urges CAISO to work with stakeholders to mitigate the validation problems associated with modeling of new-generation projects; which seem to be causing much of the need for additional validation time.