

Energy Storage Interconnection Draft Final Proposal

Submitted by	Company	Date Submitted
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LSA appreciates the opportunity to comment on the Energy Storage Interconnection Initiative Draft Final Proposal (Proposal). As before in this stakeholder process, LSA’s comments here are limited to the application and assessment process for addition of “Behind the Meter” (BTM) storage capability to planned/existing generating facilities.

The CAISO’s Proposal on that issue is summarized below.

PROJECT STATUS	APPLICATION PROCESS	ASSESSMENT CRITERIA* Approved if:
Pre-COD Project*	Material Modification Assessment (MMA) request Per Queue Management BPM provisions	Changes would have no material impact on other IR (cost or timing), and that conclusion can be reached without a detailed study
Post-COD Project	Modification Review request Per LGIA Section 5.19 and SGIA Sections 3.4.5 and 6.2	Total project “capability” after the changes would be no more than the current capability and “electrical characteristics” would be substantially unchanged

* Where Commercial Operation has not yet been declared for all the capacity of the Project.

LSA appreciates the revision in the Proposal to the CAISO’s positions on “Post-COD” projects. The prior version stated that a new Interconnection Request (IR) would have to be submitted for a BTM addition at that point, while the current Proposal allows for consideration of such additions with a more abbreviated assessment process.

However, LSA continues to believe that the approval criteria for BTM capacity additions should use the same criteria. It continues to be unclear to LSA why a BTM addition should be assessed differently for a Pre-COD and a Post-COD project, since the impact on the system would be exactly the same for both (i.e., why a MMA request for a BTM addition should be evaluated differently from a Modification Review request for the same thing).

To illustrate this concept, consider two 100-MW solar generation projects (Project A and Project B). They are located next to each other, with the same Point of Interconnection (POI) – say, a substation – and will use the same generation technology and be configured similarly. Each project wishes to add a 10-MW BTM storage facility, using the same storage technology. The only difference between them is that Project A has not yet reached COD for all of its capacity but Project B has.

The operational impact of the 10 MW BTM storage addition to Project A would be exactly the same as the operational impact of the 10 MW storage addition to Project B. As such, there is no apparent rationale for assessing the BTM capacity requests for the two projects using two different criteria.

LSA asks the CAISO to rationalize this process by applying the same assessment criteria for both. Those criteria should be that the addition would cause no adverse impacts on other generation projects (operating or in the queue), no short-circuit duty issues, and accommodate participation in applicable RAS or SPS.