

I. Answer

A. The comments do not pertain to whether the CAISO’s proposed tariff revisions are just and reasonable.

This proceeding addresses a single issue: whether the CAISO’s proposed tariff revisions are just and reasonable under the Federal Power Act.³ The CAISO’s proposed tariff revisions comprise a single sentence: “Notwithstanding Section 3.3.1, the CAISO will not open a Cluster Application Window in 2024.”⁴ The CAISO reiterates this fact because NCPA, Six Cities, and NextEra’s comments discuss other issues. NCPA and Six Cities, for example, admit that their comments do not pertain to the CAISO’s filing. NCPA states that it “submits these comments to emphasize the scope of the problem CAISO and its stakeholders are facing in anticipation of CAISO’s *upcoming* interconnection-related filings.”⁵ Six Cities likewise states its comments “identify important considerations for the CAISO’s efforts to *develop* enhancements to its interconnection processes,”⁶ and NextEra states it “remain[s] skeptical [about] the IPE initiative.”⁷ The CAISO understands these parties’ concerns; however, this proceeding does not pertain to upcoming filings or developing enhancements.

NCPA, Six Cities, and NextEra have every opportunity to continue to participate in the CAISO’s Interconnection Process Enhancements stakeholder

³ 16 U.S.C. § 824d.

⁴ Proposed Section 17 of Appendix DD to the CAISO tariff.

⁵ NCPA Comments at 1-2 (emphasis added).

⁶ Six Cities Comments at 1 (emphasis added).

⁷ NextEra Comments at 2-3.

initiative.⁸ The CAISO has duly considered their comments in that initiative to date,⁹ and has changed its proposals as the direct result of their comments. NCPA, Six Cities, and NextEra do not need to communicate to the CAISO through an unrelated FERC proceeding. Nor should the Commission enable NCPA, Six Cities, and NextEra to pre-empt filings that have not begun by considering them in an unrelated proceeding.

B. The Commission should approve the CAISO’s proposed tariff revisions as just and reasonable.

As the CAISO explained in its transmittal letter, forgoing the 2024 interconnection request window is the just and reasonable solution. Adding even more interconnection requests before the CAISO has commenced Cluster 15 studies would exacerbate every challenge described by the CAISO and the commenters. In their limited focus on the CAISO’s filing, NCPA, Six Cities, and NextEra agree. NCPA states it “does not believe that any entity doing business in the CAISO BAA could seriously challenge the magnitude of the problem CAISO faces with the queue backlog or could suggest that anyone benefits if more projects pile into the already clogged queue this year.”¹⁰ Six Cities likewise states it does not oppose the CAISO’s tariff amendment.¹¹ The huge increase in the volume of interconnection requests dug a hole, to be sure, but one must first stop digging

⁸ <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Interconnection-process-enhancements-2023>.

⁹ See, e.g., Stakeholder Comments on Draft Final Proposal, <https://stakeholdercenter.caiso.com/Comments/AllComments/aab81f7d-e930-4b23-9f41-1fa8dac4576c> (including comments from NCPA, Six Cities, and NextEra).

¹⁰ NCPA Comments at 1.

¹¹ Six Cities Comments at 1.

before trying to climb out. The Commission should thus approve the CAISO's proposal to forgo a new interconnection request window in 2024.

C. The CAISO's efforts demonstrate its success.

NCPA, Six Cities, and NextEra's comments each discuss the significant challenges the CAISO faces. But the CAISO's successes demonstrate it is making meaningful progress. With the two-month extension the Commission granted the CAISO in 2023,¹² the CAISO was able to complete the Phase II study results for cluster 14. Cluster 14 now consists of 204 interconnection customers with 65,506 MW of capacity, 125 percent of the CAISO's historic peak demand. These interconnection customers have completed interconnection studies with firm cost caps, and can proceed toward finding offtakers and executing generator interconnection agreements.

The CAISO also has published a draft final proposal in its Interconnection Process Enhancements stakeholder initiative, and intends to take that proposal to its Board of Governors in May before submitting the tariff revisions to the Commission this summer.¹³ Those tariff revisions are intended to address the CAISO's current queue volume and future intake. The CAISO also will reform its interconnection procedures significantly next month when it submits its compliance filing with Order No. 2023.

The CAISO thus understands NCPA, Six Cities, and NextEra's concerns, but

¹² *California Independent System Operator Corp.*, 184 FERC ¶ 61,069 (2023).

¹³ <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Interconnection-process-enhancements-2023>.

the Commission should rest assured that the CAISO shares those concerns, and will address them very soon.

II. Conclusion

For the reasons explained above and in this proceeding, the CAISO respectfully requests that the Commission accept the proposed tariff revisions as filed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA this 7th day of March, 2024.

/s/ Jacqueline Meredith
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