



## 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](mailto: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:**

NCPA recognizes CAISO’s desire to modify the Cluster 14 study process and timeline due the historically large volume of projects and appreciates the opportunity to submit comments to the proposals. Both CAISO and CPUC have indicated that the CAISO grid requires incremental resources immediately so adding an additional year to the study is concerning especially given current tight supply conditions and the fact that many projects in earlier queues are experiencing delays for various reasons. NCPA requests that CAISO continue looking at ways to maintain the current three-year window or even shorten that. One potential option could be preliminary vetting of projects. As with any cluster, study results will require a significant number of projects to drop out. NCPA asks CAISO to consider vetting potentially unviable projects based on shared characteristics with prior opt-outs and discuss with the developers whether the project should remain in the queue so CAISO can focus on fast-tracking more viable resources.

Regardless of whatever timeline is determined, NCPA understands CAISO’s concern that releasing some projects’ study results earlier than others may be an unfair advantage in the RFO process for power purchase agreements. However, NCPA asks CAISO to consider releasing early results for projects that already have a PPA, letter of intent, or

## **Issue Paper and Draft Final Proposal Comments**

some other documentation confirming the resource's RFO process is complete and an off-taker has been identified. In addition, NCPA requests the CAISO look into what options could be available for fast-tracking such projects due to increasing resource scarcity in the Western Interconnection.