

# Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the stakeholder initiative:

## **“2017 Expedited GIDAP Enhancements Straw Proposal”**

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due Friday, August 11, 2017 by 5:00pm**

The Issue Paper posted on July 21, 2017 and the presentations discussed during the August 4, 2017 stakeholder meeting can be found at CAISO.com or at the following link:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/2017ExpeditedGIDAPEnhancements.aspx>

Please use this template to provide your written comments on the issue paper topics listed below and any additional comments that you wish to provide.

The Office of Ratepayer Advocates (ORA) is the independent consumer advocate within the California Public Utilities Commission (CPUC), with a mandate to obtain the lowest possible rates for utility services consistent with reliable and safe service levels, and the state’s environmental goals.

These are ORA’s comments and recommendations on the California Independent System Operator’s (CAISO) July 24, 2017 *Expedited Generator Interconnection and Deliverability Allocation Procedures (GIDAP) and Enhancements Draft Issue Paper and Straw Proposal* (Issue Paper and Straw Proposal) and the August 4, 2017 stakeholder presentation.

## 1. Do you support the Extended Parking straw proposal? And why?

### **Comments:**

The proposed Generator Interconnection and Deliverability Allocation Procedure enhancement would extend the allowable parking period from one year to two years.

At this time, ORA does not support extending the parking period another year for the reasons explained below.

#### Cost Risks to Ratepayers

As presented in the August 4, 2017 CAISO stakeholder call, the proposed extended parking period could increase cost risks to projects and Participating Transmission Owners (PTO).<sup>1</sup> In some scenarios, these increased project cost risks will not be borne by later queued projects, but will be transferred to PTOs, and ultimately passed on to ratepayers.

#### Renewable Portfolio Standard (RPS) Energy Deliverability Requirements

If interconnection customers<sup>2</sup> do not receive Full Capacity Deliverability Status (FCDS) due to CAISO's Transmission Planning Deliverability (TP Deliverability) determination after the existing one-year parking period, they can withdraw their projects or convert them to Energy Only (EO) deliverability status.

During the August 4, 2017 stakeholder call, the CAISO indicated that nearly 40% of parked projects converted to EO deliverability status. This is a reasonable outcome because resources with EO deliverability status are considered equally as effective as FCDS resources in meeting California's 50% RPS target by 2030.<sup>3</sup>

#### Proposed Renewables in the Interconnection Queue Exceed Renewable Portfolio Standard (RPS) Targets

As discussed in the August 4, 2017 stakeholder call, California investor-owned utilities are all well-positioned to meet the state's current RPS targets in the coming years.

To illustrate this point, the CAISO has estimated that 3,300 megawatts (MW) of additional renewable capacity are needed by 2020 to meet the state's 33% RPS target.<sup>4</sup> The Renewable Energy Transmission Initiative 2.0 Final Plenary Report, dated February 23, 2017, estimated that

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<sup>1</sup> *2017 Expedited GIDAP Enhancements Issue Paper and Straw Proposal*, August 4, 2017; CAISO Stakeholder Meeting Presentation, slide 8.

<sup>2</sup> In this Issue Paper, the CAISO refers to developers seeking an interconnection to the CAISO controlled grid as interconnection customers.

<sup>3</sup> *ISO Issue Paper* p. 9-10 "it remains to be determined whether additional transmission capacity should be built to make the additional renewable capacity needed to make 50% deliverable, which impacts whether incremental renewable capacity should be procured as FCDS or Energy Only."

<sup>4</sup> *Briefing on renewables in the generator interconnection queue*, Memorandum from Keith Casey, CAISO to the CAISO Board of Governors, July 19, 2017, (Memo regarding Renewables Queue) p. 1.

California would need to add between 9,000 to 15,000 MW (beyond 2020) to meet its 50% RPS target by 2030.<sup>5</sup>

As of July 2017, the CAISO queue for renewable interconnection requests contained approximately 58,000 MW of new generation, consisting of 13,325 MW of storage and 39,387 MW of other renewables.<sup>6</sup> Given the amount of renewable generation in the CAISO queue, it is not necessary to continue to consider a project for FCDS at the expense of later queued projects that could potentially meet the state's RPS targets more efficiently.

#### Forthcoming Related 2018 CAISO Initiative

If there is cause to revise the qualification criteria for TP Deliverability, the CAISO has committed to examining this criteria "comprehensively"<sup>7</sup> through an Interconnection Process Enhancement Initiative in 2018.

ORA does not recommend authorizing an additional year of parking to allow projects to obtain a TP Deliverability allocation, because this proposed additional year of parking would pose cost risks to ratepayers, and the entire amount of the generation already in the queue is not necessary to meet the state's current RPS targets.

#### 2. Do you support the Interconnection Request (IR) Window & Validation Timelines Straw Proposal? And why?

**Comments:** At this time, ORA has no comment on this issue.

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<sup>5</sup> *Renewable Energy Transmission Initiative 2.0, Final Plenary Report*, California Energy Commission, February 23, 2017, p. 4.

<sup>6</sup> Memo regarding Renewables Queue, p. 1.

<sup>7</sup> Issue Paper and Straw Proposal, p. 3.