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May 16, 2023

CAISO Board of Governors
Chair Mary Leslie
Jan Schori
Severin Borenstein
Angelina Galiteva
Joe Eto

Re: Interconnection Process Enhancements 2023 Track 1 (IPE 2023)
NCPA Comments to the Board of Governors

Dear CAISO Board of Governors:

Thank you for your consideration of the following comments. The Northern California Power Agency (NCPA) understands the problem the CAISO faces in the size of the Interconnection Queue and appreciates that action must be taken to address the problem. However, CAISO must ensure it is serving all Load Serving Entities (LSEs) within its footprint on a comparable basis. It must also provide regular opportunities for projects to be submitted. NCPA fears that the IPE 2023 initiative, as currently envisioned, taken together with changes envisioned for the Transmission Planning Process (TPP), will reduce the ability of NCPA and other non-CPUC-jurisdictional LSEs to have their projects considered in the interconnection process on a comparable basis.

- Under the proposal outlined in the IPE 2023 Issue Paper and Straw Proposal, a non-CPUC-jurisdictional entity would have no opportunity to have its projects considered in the TPP which will use the CPUC's resource portfolio to identify TPP and Interconnection needs, thus deprioritizing NCPA projects for access in the Interconnection Process.
- For CAISO to treat the projects needed by non-CPUC-jurisdictional LSEs as less than equal with projects proposed by CPUC-jurisdictional entities would be unduly discriminatory and in conflict with Sections 205, 206, 211, 212 and 217 of the Federal Power Act, along with the policies established in Rules 888, 889, 890 and 2003.

- The deferral of the Independent Study Process until after Cluster 15 projects have received their Phase 1 Interconnection Study results will further delay any opportunity for using the Independent Study Process (ISP) for transmission requests, potentially until late 2024 (if not later). The decision to interrupt the yearly cadence of the opening of the cluster windows creates a gap before any future projects can be submitted.

There must be an opportunity for non-CPUC-jurisdictional entities to have their project needs considered in the TPP and accorded the same priority as the projects for CPUC-jurisdictional entities, and for their projects to be submitted on a regular and timely basis.

NCPA looks forward to the continued opportunity to work with the CAISO and other stakeholders to address the concerns described herein, as part of the ongoing stakeholder process.

Sincerely,



Tony Zimmer
Assistant General Manager, Power Management
Northern California Power Agency