

# Stakeholder Comments Template

| Submitted by | Company                                    | Date Submitted     |
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| Alan Comnes  | SunPower Corporation, Systems (“SunPower”) | September 13, 2017 |

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 Wednesday, September 13, 2017 by 5:00pm**

The Issue Paper posted on July 21, 2017, the Revised Issue Paper posted on August 30, 2017, and the presentations discussed during the September 7, 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.

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

**Comments:** SunPower fully supports the comments filed today by the Large Scale Solar Association (LSA). LSA supports the “parking” extension element in concept but has serious concerns about these eligibility conditions. CAISO must remove the two eligibility conditions from the proposal, or at least significantly modifying them. Furthermore, LSA believes that the CAISO should defer consideration of its “clarification” that generation projects cannot pursue a GIA while parked.

SunPower is a member of LSA and notes that its comments reflect the consensus of multiple LSA members that have invested considerable risk capital to submit and

maintain many projects in the CAISO queue. LSA member projects are significantly affected by the Extended Parking straw proposal and, for this reason, the comments of LSA should be given great weight.

SunPower also notes that there is a large disconnect in most CAISO transmission planning areas between the amount of Full Capacity projects planned for in the TPP and the demand for Full Capacity projects clear today or as projected under a 50%+ RPS. Given the failure of CAISO's planning process to keep up with the demand for full capacity projects, FC projects currently in the queue should not be arbitrarily forced to convert to EO or withdraw after only 15 months after receiving Phase 2 report. Projects should be allowed to stay in the queue and simultaneously be required to continue to demonstrate viability (PPAs, permits, etc.) and obtain Full Capacity Deliverability (a TPD allocation) when such capacity becomes available. The CAISO's tariff option for Annual Deliverability requests is an inadequate path for restoring deliverability.

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

**Comments:** SunPower fully supports the comments filed today by the Large Scale Solar Association (LSA) on the "Timelines" proposal.