

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

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:

Westlands Solar Park (WSP) again expresses its support of the Extended Parking initiative, but continues to believe that the eligibility criteria are too restrictive. As written, the proposal will be of limited value to the projects currently in the queue because of the criterion that no later-queued projects rely on network upgrades assigned to the project. The CAISO’s interconnection process already includes risks due to lack of transparency, withdrawals, downsizing, and suspension and WSP still firmly believes that there must be a better solution to mitigating any perceived new risks to future projects that may arise from extending the parking

period. For example, in the case of suspension of work on Network Upgrades common to multiple generating facilities, the CAISO performs a case by case review.¹ The CAISO's extended parking initiative is premised on limited applicability to Queue Cluster 8, and the Revised Straw Proposal states that only 21 projects are parked.² Thus, a brief, close review of projects electing to park a second year would be capped at 21 and may be fewer. A case by case analysis may show limited or no impact to later queued projects relying on network upgrades, due to, for example, the timing of a later queued project's proposed Commercial Operation Date that could allow for a delay of a discrete network upgrade if other required upgrades have longer timelines. Additionally, as market conditions are anemic right now for renewable procurement, it likely follows that very few later queue projects will be relying on these network upgrades to be completed on the timeframe originally determined. WSP believes that a more specific analysis of individual projects is warranted giving the unique circumstances and the limited number of projects.

Projects in Queue Cluster 8 have posted substantial financial security in the form of private capital to meet California's ambitious renewable portfolio standards. These postings, as well as continued development through permitting and site control, demonstrate a commitment to the CAISO and to California's goals at significant risk to the project developers. In the uncertain procurement landscape that exists today, these projects deserve additional time to market their projects until the CPUC's and other processes obstructing clarity in procurement roles and responsibilities are resolved. We again ask the CAISO to reevaluate this criterion and address risks in a way that would not exclude these projects from eligibility for a second year of posting.

Additional clarification for other QC8 projects

WSP also requests the CAISO consider a broader application of this proposal to all projects in Queue Cluster 8 (QC8). The stated goal of the initiative is to preserve eligibility for deliverability for projects in this queue cluster due to issues in the procurement landscape and TP deliverability eligibility criteria that are too high.³ The additional year of parking is designed to mitigate these issues for projects that were unable to meet the eligibility requirements for TP Deliverability before the November 2016 affidavit, chose to park, and still need additional time to market the project. However, it is unclear how this initiative will affect projects in QC8 that were allocated deliverability based on shortlisting and have also been unable to secure a PPA. In the upcoming November 2017 affidavit, projects that were allocated deliverability must attest to either a signed PPA or balance-sheet financing. Though shortlisting was enough to

¹ CAISO BPM for Generator Management Section 10.1.

² CAISO Revised Straw Proposal, pg. 9.

³ CAISO Revised Straw Proposal, pg. 8.

initially be allocated deliverability, in year two shortlisting is not enough to retain it. However, due to stalled procurement, many of these projects either remain shortlisted or may be engaged in additional marketing efforts, but have not yet secured a PPA. These projects face the same procurement landscape issues and deserve equal treatment in light of the goal of preserving eligibility for deliverability for an additional year. This will additionally ensure there are enough viable projects that can meet the timing requirements to take advantage of the full ITC.

Extending the proposal as an interim measure to accommodate projects seeking to retain deliverability presents even fewer risks to later queued projects. While some projects may seek to park during the second year for the first time, others have been actively negotiating GIAs and these Interconnection Customers likely anticipate having executed agreements in advance of the November affidavit. These projects in particular have demonstrated viability through their shortlisting and continued progress on their GIAs and deserve to retain eligibility for deliverability along with the other projects in QC8.

WSP understands that the CAISO intends to require November deliverability affidavits as usual and may allow for a one-time adjustment based on the conclusion of this initiative. However, WSP asks that the CAISO present more clear directions or revised affidavits in advance of the deadline because of the significant business decisions that are reflected in them.

WSP appreciates the opportunity to continue working with the CAISO on this initiative and on the upcoming 2018 IPE process beginning next year.

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

Comments:

Westlands Solar Park has no concerns with this aspect of the proposal.