

# 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.

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

#### **Comments:**

Westlands Solar Park appreciates the CAISO addressing this issue and supports the Extended Parking proposal. The second year of parking will provide much needed relief to projects that are experiencing the consequences of uncertainty in the procurement landscape and will benefit LSEs in the long run by ensuring that enough viable and cost-effective projects remain in the queue to meet RPS needs.

However, we are concerned with the eligibility criterion that no later-queued projects rely on network upgrades assigned to the project. As written, the proposal has very limited value because there may be very few projects that meet this criterion. We understand that the reliance on these upgrades may be problematic to other projects, but believe there must be a better way to mitigate this risk. With projects

dropping out of the queue and downsizing, the annual reassessments already can produce results that affect the expectations of later-queued projects. The CAISO process should provide greater transparency into how deliverability allocation decisions are made, what projects are relying on upgrades and the status of those projects. Adding one more year of parking for Queue Cluster 8 projects should not have a significant negative impact on later queued projects that is beyond the risks already present in the interconnection process. These earlier projects have posted substantial financial security in an effort to meet California laws mandating the implementation of renewables. These postings demonstrate commitment to the CAISO, and the projects thus deserve additional time for the market environment to adjust while the CAISO and the State consider additional screening processes or metrics to be used more consistently going forward. We ask that the CAISO reevaluate this criterion and address any risks in a way that would not exclude these projects from eligibility for a second year of parking.

Westlands Solar Park appreciates the opportunity to comment on this possible solution and looks forward to participating in the longer 2018 IEP process next year to address larger issues in the GIDAP process.

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.