

Clearway Energy Group
100 California Street, Floor 4
San Francisco, CA 94111

clearwayenergygroup.com



September 14, 2018

**Comments of Clearway Energy Group on Proposed Tariff Changes for 2018
Interconnection Process Enhancement (IPE) Initiative, Tracks 1-2**

Clearway Energy Group (“Clearway”) appreciates the opportunity to comment on the CAISO’s posted draft tariff language for the 2018 IPE initiative. Clearway commenced operations on August 31, 2018 with the completion of the sale of NRG Energy, Inc.’s renewables platform.

Clearway supports the comments of the Large-scale Solar Association (LSA) on the CAISO’s draft tariff language. In particular, Clearway wishes to highlight the need for a logical transition path for projects that received TPD allocations under the current system to convert to TPD Allocation Group 3. Projects that are exiting parking status, that received TPD allocations based on a shortlist position but have not signed a PPA, that received TPD allocations based on a balance-sheet financing affidavit, or that received TPD allocations based on a PPA but lost the PPA due to unilateral action by the offtaker, should be allowed the option to convert to TPD Allocation Group 3. Importantly, this conversion should be optional: Projects that previously received TPD allocations based on balance-sheet financing affidavits should be allowed to continue relying on those affidavits to retain their current allocations.

As the CAISO implements changes to improve the interconnection process going forward, it is critically important to establish a transition path for projects currently in the queue. Without the ability to convert to Allocation Group 3, projects currently holding TPD allocations may be placed at risk because the path they intended to use to retain their deliverability allocations no longer exists.

Clearway also strongly supports LSA’s comment that the proposed tariff language change relating to financial security forfeits for Group 3 projects should be deleted. This proposal was not included in the Revised Straw Proposal and correspondingly should not be included in the tariff language.