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**RE: Comments Of EDF-Renewables (EDF-R) on Proposed Tariff Changes for 2018 Interconnection Process Enhancement (IPE) Initiative, Tracks 1-2**

**From: Omar Martino, Director-Transmission Strategy**

EDF-R appreciates the opportunity to review and comment on the CAISO's posted draft tariff language for the 2018 Interconnection Process Enhancements (IPE) initiative. Generally, the posted tariff changes accurately reflect the CAISO's proposals as adopted by the Board, and only minor changes or clarifications are needed.

However, EDF-R recommends that the CAISO consider changes in two areas where its proposals were unclear or incomplete, both of which concern generation projects in the queue that are past the 7/10-year tariff development deadline. Specifically:

- **The CAISO should explicitly include these limited exceptions to the “fuel change” prohibition:**
  - Technology updates, an exception proposed earlier but unclear in the Revised Straw Proposal; and
  - Energy storage additions, to reflect the CAISO's revision/clarification at the September 5th CAISO Board meeting.
- **The CAISO should defer any CVC requirement for other non-material modifications to Track 3**, since it was omitted from the Track 2 comment template and requires further discussion.

These proposed revisions are further explained below and are also reflected in the accompanying tariff-language mark-up.

**Limited exceptions to technology change prohibition for projects past the 7/10-year tariff development deadline (Tariff Section 6.7.2.4)**

As noted in EDF-R's earlier comments, EDF-R strongly supports this proposal generally. However, the CAISO should add the exceptions described below.

- **Technology updates:** The Straw Proposal stated that limited exceptions would be made to the technology change prohibition, at p. 61:

“The CAISO also recognizes the need for a limited exception to this policy that allows customers with projects that have not yet declared commercial operation to retain their fuel type and update their technology to the best available (e.g., a change to the number, type, or manufacturer for project inverters.)”

This exception was supported in stakeholder comments, but it was neither included nor rescinded in the Revised Straw Proposal; it should be added to the draft tariff language.

- **Additions of energy storage**: As discussed at the September 5th Board meeting, the CAISO added an exception for additions of energy storage, as long as the original project fuel type and capacity are materially maintained.

### **Commercial Viability Criteria for Retention of Deliverability beyond Seven Years in Queue (Tariff Section 6.7.4)**

The CAISO should reconsider this proposal to require CVC compliance for any modification of proposals beyond the 7-year tariff development deadline. Specifically, the CAISO should consider moving this proposal to Track 3, because:

- **This proposal was missing from the comment template** for the Revised Straw Proposal and not discussed at the associated stakeholder meeting – probably why the CAISO received no stakeholder feedback about it.
- **This proposal ignores changes that could help a project acquire a PPA and/or benefit others.** For example, consider a project requesting a non-material modification to share a gen-tie with a nearby project. This change would lower its costs and increase its chances of acquiring a PPA, and it would have the additional benefit of “freeing up” space for use by other projects where the original gen-tie would have interconnected at the substation.
- **A CVC requirement was not mentioned** in the discussions at the Board meeting about allowing storage additions to older projects.
- **The issue of partial PPA coverage and/or applicability of Balance-Sheet Financing (BSF) Affidavits was not addressed**, e.g., circumstances where PPAs or BSFAs cover only some project capacity.

For example, consider a project needing a non-material modification to comply with a PPA for part of its capacity (e.g., phasing, separate metering, COD change, storage addition). This project should not be faced with potential loss of TP Deliverability for the other part of its project to comply with the PPA.

In conclusion, this proposal has not had the consideration and stakeholder discussion that is warranted for such a far-reaching proposal and would benefit from another look in Track 3.