

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
Orijit Ghoshal <a href="mailto:oghoshal@inverenergyllc.com">oghoshal@inverenergyllc.com</a> 303-800-9340	Inverenergy LLC	2/7/2018

Inverenergy LLC ("Inverenergy"), is an Illinois limited liability company headquartered in Chicago, Illinois. Through its affiliates, Inverenergy is an owner and operator of generation and energy storage assets from diverse technology classes throughout North America, South America, Europe, and Japan, including generation and storage facilities and developments in the California Independent System Operator Corporation ("CAISO") footprint. Inverenergy thanks CAISO for the opportunity to comment on CAISO's 2018 IPE Issue Paper. The lack of Inverenergy comment on any section or proposal below does not imply endorsement of such section or proposal and Inverenergy reserves the right to oppose or support those sections or proposals in the future.

### 5.2 Replacing Entire Existing Generator Facilities with Storage

In the 2018 IPE Issue Paper, CAISO proposed not to include this topic in the 2018 IPE Initiative. Inverenergy believes that CAISO should reconsider this omission. CAISO's stated reason for not including this topic in the 2018 IPE Initiative is that "a whole change from the studied project to storage ... must go through the cluster study process as a new project." First, Inverenergy requests that certain sub-issues addressed in this section be included in the 2018 IPE Initiative as they do not address whether or not whole changes should be treated as modifications or new projects. For example, CAISO should clarify whether the 10% ceiling on conversion is a hard standard or simply practice. Doing so would provide certainty to developers who can, in turn, design better projects and reduce the requests tendered to CAISO without having to determine whether whole changes to storage trigger the new process as opposed to the modification process. In addition, CAISO should establish a cutoff date for changes in technology to be tendered through the modification request process that is as late as feasible for CAISO. This would give developers a certain target to tender modifications and could help provide certainty to CAISO staff on what requests may be pending. Moreover, establishing such a date would not require CAISO to determine whether whole changes should trigger the modification request or new process.

In addition to the sub-issues identified above, CAISO should reconsider its omission of the “whole change” issue. As CAISO itself notes, it is possible for storage to be added or for storage to replace existing generating facility requests “without substantially changing the electrical characteristics of the generating facility,” and whole changes could be studied through the modification process even if they do change some of the electrical characteristics of the generating facility.

#### 9.7 Material Modification for Parked Projects

In the 2018 IPE Issue Paper, CAISO proposed to include the issue of whether parked projects can avail themselves of modification requests. Invenenergy opposes inclusion of this topic in the 2018 IPE. Invenenergy believes that CAISO’s proposal is premised on a faulty assumption, that the modification process for parked projects is “similar to nor working on the [Generator Interconnection Agreement] while a project is parked. This assumption is faulty because the GIA is wholly different from and, in fact, requires the output of the study process under which the modification request is tendered to be completed as a condition precedent for execution of the GIA. Because the study process, under which modifications are requested, is distinct from and has different purposes than the GIA execution process, the proposed restriction against parked projects from entering into a GIA should not be used as a basis to justify restricting the ability of parked projects to request modifications.