

# 2023 Interconnection Process Enhancements Track 2: Draft Final Proposal

February 15, 2024

#### Housekeeping reminders

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- This collaborative meeting are intended to stimulate open dialogue and engage different perspectives.
- Please keep comments professional and respectful.
- Please try and be brief and refrain from repeating what has already been said so that we can manage the time efficiently.
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- If you are connected to audio through your computer or used the "call me" option, select the raise hand icon blocated on the bottom of your screen.
  - Note: #2 only works if you dialed into the meeting.
  - Please remember to state your name and affiliation before making your comment.
- You may also send your question via chat to Isabella Nicosia or to all panelists.



### Agenda

Time	Topic	Presenter
9:00 – 9:15	Welcome & introductions	Isabella Nicosia Danielle Mills
9:15 – 10:00	Zonal approach: data accessibility	Jeff Billinton
10:00 – 12:00	Interconnection request intake	Danielle Mills, Bob Emmert, Robert Sparks, Binaya Shrestha
12:00 – 1:00	Lunch break	
1:00 – 3:45	Contract and queue management	Jill Jordan, Jason Foster, Deb Le Vine
3:45 – 4:00	Next steps	Isabella Nicosia



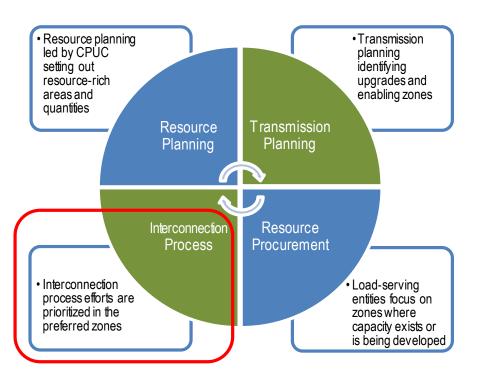
#### CAISO Policy Initiative Stakeholder Process





This represents the typical process, and often stages of the process run in parallel.

# Transformative change to the interconnection process is part of a larger coordinated strategy with state agencies.



- The reformed approach is designed to strengthen resource adequacy and meet California's policy requirements.
- The ISO seeks to re-align the interconnection process with local and state resource and transmission plans in order to bring new capacity online.
- The ISO is proposing fundamental changes to the interconnection process in order to keep pace with the interest in and need for new capacity on the system.

Transmission development must continue in order to effectuate resource planning, procurement, and interconnection.



Interconnection reform efforts are moving forward on parallel timeframes, but the ISO is working to provide clarity on the process.

- FERC Order No. 2023 Filing Due April 3, 2024
- Cluster 16 postponement Board of Governors Approval in February 2024, filed at FERC.



### Application of Interconnection Process Enhancement (IPE) reform

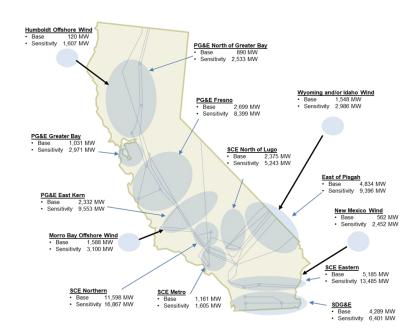
- The ISO proposes that the interconnection request intake reforms be applied to Cluster 15 and beyond.
- The ISO proposes that most contract and queue management reforms be applied to all projects in the queue.

## THE ZONAL APPROACH: DATA AVAILABILITY



### Data accessibility is key to operationalizing the zonal approach.

- Within the Interconnection Zones identified in the 2022-2023 Transmission Plan, sub-zones are based upon constraints that have been identified through studies:
  - Substations within Interconnection zone and sub-zones
  - Available capacity within the subzone based on the constraint
  - Transmission Plan Deliverability (TPD) capacity that has been allocated within the sub-zone.

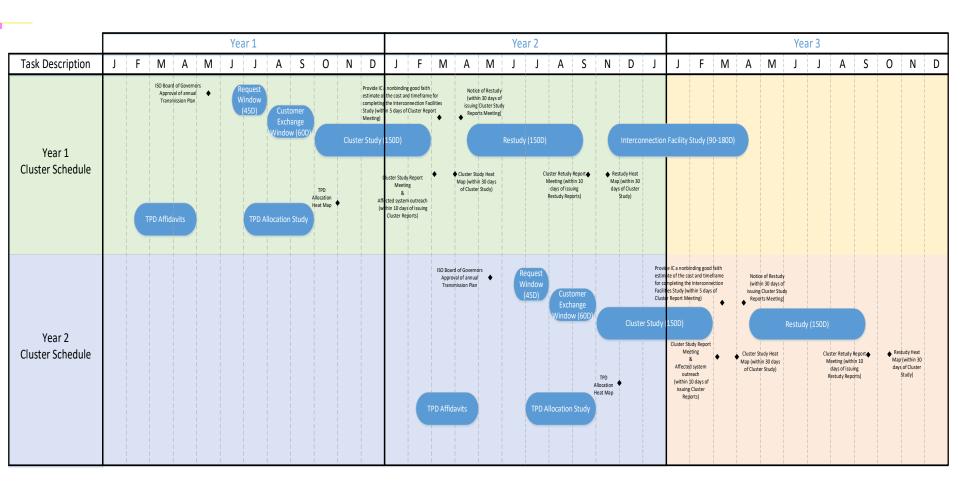


- Proposal to make individual interconnection reports publicly available with confidential information redacted.
- The ISO will provide a heat map with specific information after each cluster study and restudy (as required by Order No. 2023), and proposes to capture the TPD allocation study as well.



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### Data will be come available at various stages of the Cluster cycles





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#### Interconnection request limitations

- The ISO does not propose any new site control requirements beyond those required by FERC Order No. 2023.
- The ISO does not propose any additional entry fees or study deposits beyond those required by FERC Order No. 2023.
- Based on robust stakeholder discussion and feedback, the ISO no longer proposes to limit the number of interconnection requests a developer can submit in a given cluster window.

# Treatment of Full Capacity Delivery Status (FCDS), Partial Capacity Deliverability Status (PCDS) and Energy Only (EO) Projects

- FCDS, PCDS, and EO projects will be required to meet the same site control requirements, provide the same entry fees and study deposits, and provide a self-assessment IR score sheet. They would all proceed through scoring process and compete to be studied in the same manner.
- EO resource capacity will not count toward the 150% cap, as the cap is based on TPD capacity and the inclusion of EO projects would increase the number of projects that advance to the study process, but would not increase the deliverable capacity to be studied.
- EO projects would not be eligible to seek TPD until reach COD.



# PRIORITIZATION OF PROJECTS ADVANCING TO THE STUDY PROCESS



#### Scoring criteria for prioritization to study process

- Criteria designed to rank interconnection requests by zone based on readiness. Seeking a balance of objectivity and granularity.
- Used to advance projects (up to 150% of available transmission capacity within each zone) to the study process.
- A project that crosses the 150% line will be studied in its entirety.

Indicators of Readiness	Max Total Points	Weight (%)	Max Weighted Points
Commercial Interest	100	30%	30
Project Viability	100	35%	35
System Need	100	35%	35
Total		100%	100



### Scoring criteria for prioritization to study process - LSE Interest

Indicators of Readiness	Points	Weight (%)	Max Points	Validation
Commercial Interest (Max points= 100)				
LSE allocations: Points based on the percentage of capacity allocated by LSEs to the project (e.g. a 500 MW project receiving 500 MW capacity allocation would earn 100 points for this category. A 500 MW project receiving 250 MW capacity allocation would earn 50 points for this category.) In instances where a non-CPUC jurisdictional LSE does not have enough points to award to an entire project, each non-CPUC jurisdictional LSE may award full capacity for one project per interconnection request application window.	100	30%	30	The ISO will provide LSEs with a form to fill out to assign points to desired interconnection requests, to return to the ISO during the interconnection request application window. The ISO will add the points to each project's score as part of the scoring process.
□ Non-LSE Interest: Points	25			Signed affidavit indicating and affirming commercial interest from procurement division of non-LSE offtaker.

 Interconnection projects may only receive a maximum of 100 points for the Commercial Interest category, though those points may come from a combination of the LSE allocation process and the non-LSE interest indicators.



#### LSE allocation process

- Each LSE will receive a capacity allocation based on available and planned transmission capacity for a given cluster. The ISO will provide LSEs with a standard LSE Interconnection Allocation Form for submittal of selections.
- LSEs will provide the ISO with their elections during the interconnection request window to utilize their points
- The ISO will review and total these scores once it receives information from LSEs.
- Points awarded to projects by LSEs will not be known or confirmed by the interconnection customer during the interconnection request application window, and therefore will not be included in the interconnection customer's self assessment.



#### Full allocation election

- If an LSE has a high priority interest in one project and does not have sufficient capacity to allocate to that project's full MW size, it may award all of its capacity towards that **one** project – and elect to have the project receive the full 100 points.
  - Each LSE may opt for this this full allocation election for one project per cycle.
  - LSEs cannot make this election for a project that exceeds more than 150% of that LSE's individual capacity allocation for that particular cycle.
  - The capacity awarded to these projects may, however, exceed the 150% of available capacity threshold to advance to the study process.
  - This election and its limits applies to both CPUC-jurisdictional and non-CPUC jurisdictional LSEs.



#### Limits on LSE-owned projects

- To avoid preferential treatment of utility-owned resources, the ISO proposes that LSEs may only award points to one self-built project each cycle.
- If an LSE opts to use the full allocation election for a selfbuilt project, that election may not exceed 150% of that LSE's total capacity allocation for the cluster.
- This limitation also applies to both CPUC-jurisdictional and non CPUC-jurisdictional LSEs.

#### Commercial interest from non-LSEs

- The ISO proposes to award points for projects with documented commercial interest from non-LSE offtakers.
- The ISO will continue to scrutinize every non-LSE commercial arrangement proffered to ensure the company is legitimate, procuring capacity in a meaningful way, and not affiliated with the interconnection customer or its holding company.

### Scoring criteria for prioritization to study process - Project Viability

Project Viability (Max points=100)[1]				
Engineering Design Plan Completeness (check one)				Alignment with AACEI cost estimate
□ 0-5% complete = 10 points.				classification system.[2]
□ 6-10% complete = 15 points	15			
□ 11-20% complete = 20 points	20			
Chose no more than one of the three 'expansion of a generation facility' items				
□ Expansion of a generation facility that is currently under construction	10			IC submits information indicating that new IR uses same or directly adjacent site as a facility under construction
□ Expansion of an operating facility	20	35%		IC submits information indicating that new IR uses same or directly adjacen site as an operating facility
<ul> <li>Expansion of a facility that is under construction or in operation, where the Gen-Tie already has sufficient surplus capability to accommodate the additional resource</li> </ul>	40			IC submits information indicating that new IR uses same or directly adjacen site as an existing facility and documents the capacity of the gen-tie the existing (under construction or in operation) facility and the new facility
□ 100% site control of the gen-tie	40	1		



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### Scoring criteria for prioritization to study process - System Need

Indicators of Readiness		Weight (%)	Max Points	Validation
System Need (Check one. Max points=100)				
□ Ability to provide Local Resource Adequacy (RA) in an LCRA with an ISO demonstrated need for additional capacity in that local area	50			
Long Lead-time Resources  ☐ Meets the requirements of the CPUC resource portfolios where the TPP has approved transmission projects to provide the necessary transmission requirements.	100	35%	35	



### Scoring criteria for prioritization to study process Distribution Factor (DFAX) Tie-Breaker

- DFAX is a measure of the impact of injections of energy from a generator at a particular location which could result in required network changes on the grid.
- The ISO will use each project's DFAX as a tie-breaker when the selection process reaches the 150% threshold with two or more projects tied and less capacity needed to reach 150% than the sum of the tied projects.
- Projects will be selected in order of the lowest DFAX with the selection process ending with the project that caused the 150% threshold to be exceeded, regardless of the size of the last project.
- If project ties still exist after the use of projects' DFAX then the auction process will be used to break the ties.



### Auction process for final project inclusion in the study process

- If required, the ISO will conduct a market-clearing, sealed-bid auction for the right to be studied in a specific zone.
  - The auction will only be used if the viability and DFAX scoring is unable to limit the proposed capacity to 150% of available capacity within each zone.
  - Only projects that are deemed equal in viability and DFAX ratings and cause the total MW for a zone to cross the 150% capacity limit for that zone will participate in the auction.
  - Auction bids, on a dollar per MW basis, will be requested after the project scoring process has been completed.
  - Projects that submit the highest bids and are either within or the first project that crosses the 150% MW transmission zone capacity will be accepted to be studied in their entirety for that transmission zone.
  - Bidders will only submit the clearing price at-risk auction financial security if they win the auction and proceed to be studied. The clearing price, but not the individual project bids, will be posted on the ISO website.



### Auction process for final project inclusion in the study process (continued)

#### **Use of Auction Revenues**

- Auction funds posted by an interconnection customer will be in favor of the Participating TO.
  - Financial security instruments are the same as currently allowed for interconnection financial security.
- Projects that successfully compete in an auction and reach commercial operation (COD) will be refunded their auctionposted security within 90 days of COD notification to the ISO.
- If a project withdraws, or is withdrawn prior to reaching commercial operation, some or all of their auction-posted security will be forfeited and used to offset and support stillneeded network upgrades.



### Auction process for final project inclusion in zonal studies (continued)

Withdrawal Timeline (Timeline is consistent with FERC Order 2023)	Amount to be refunded to the Interconnection Customer	Amount to be dispersed to the applicable Participating TO
If Interconnection customer withdraws or is deemed withdrawn during the Cluster Study or after receipt of a Cluster Study Report, but prior to commencement of the Cluster Restudy or Interconnection Facilities Study	85%	15%
If Interconnection customer withdraws or is deemed withdrawn during the Cluster Restudy or after receipt of any applicable restudy reports issued, but prior to commencement of the Interconnection Facilities Study	70%	30%
If Interconnection customer withdraws or is deemed withdrawn during the Interconnection Facilities Study, after receipt of the Interconnection Facilities Study Report issued, or after receipt of the draft LGIA but before Interconnection customer has executed an LGIA or has requested that its LGIA be filed unexecuted	50%	50%
If Interconnection customer has executed an LGIA or has requested that its LGIA be filed unexecuted	0%	100%



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### Modifications to the Merchant-Financing "Merchant Deliverability Option" Process

- Only projects seeking to interconnect in areas that have no available or planned TPD capacity are eligible to select the Merchant option.
- Merchant option projects are not eligible to seek to interconnect in zones with available capacity and projects not selected to be studied in these zones cannot switch to the Merchant option.
- Projects requiring LDNUs will be eligible for cost recovery of the IFS posted for the LDNU.
- Projects are eligible to receive Merchant Transmission Congestion Revenue Rights for constructed ADNU.



### Modifications to the Merchant-Financing "Merchant Deliverability Option" Process (continued)

- Projects required to make an additional commercial readiness deposit with it IR towards the cost of the ADNU.
  - \$10,000 per MW, with \$500,000 min & \$5M max.
  - 50% non-refundable if project withdraws after the IR validation due date.
- Projects that complete the cluster studies will be required to increase their commercial readiness deposit to 50%.
  - And no longer eligible for a partial refund upon withdrawal.



### Modifications to the Merchant-Financing "Merchant Deliverability Option" Process (continued)

- Merchant projects will not have to compete for TPD in the allocation process – under most circumstances.
- If a future TPP determines a Merchant funded ADNU is needed to support a CPUC portfolio:
  - If Merchant project(s) have not executed a GIA, and ADNU is not in TPP base case, projects will be released from their obligation to fund the ADNU and be refunded ADNU deposit once GIA is executed.
  - Such project would retain its requested deliverability and must meet TPD retention requirements of allocation group A or B with approximately 2-years.
- Once the Merchant project(s) execute a GIA, and its ADNU is included in the TPP base case as a merchant ADNU, the Merchant project(s) must continue to fund the ADNU.



### Fulfillment of 150% of Available and Planned Transmission Capacity

- The ISO continues to propose the 150% zonal limitation as a means to reasonably filter the most ready projects to the study process, maintain open access, and ensure competition after the studies are complete.
- Further analysis of Cluster 15 data and survey results will inform any final modifications to the proposed 150% zonal limitation.



### **STUDY PROCESS**



#### The study process will align with Order No. 2023.

- Order No. 2023 requires a study process consisting of:
  - A "cluster study," which identifies the interconnection facilities, reliability network upgrades, and delivery network upgrades that each interconnection request requires;
  - A restudy evaluating the impact of withdrawals on the cluster study results; and
  - An interconnection facilities study that provides more granular and accurate cost estimates for the upgrades and facilities identified in the cluster study report.



#### Off-Peak and Operational Deliverability Assessments

- The ISO proposes to remove both the off-peak and operational deliverability assessments to meet a faster study schedule, and because of the limited value of those studies.
- The ISO will include the off-peak deliverability analysis in the transmission planning process.



## COMPETITION TO SECURE TPD IN EACH ZONE



#### **TPD Allocation Process Modifications**

- Project parking will be discontinued.
  - Projects must make any required increases to their commercial readiness deposit following the completion of the cluster studies on the required due dates.
- Projects will have three consecutive opportunities to seek an allocation, beginning with the first affidavit window after the interconnection facilities study.
  - After the third opportunity to seek an allocation, projects that have not received an allocation will be converted to Energy Only.
- EO projects are only eligible for an allocation through allocation Group C – in commercial operation, regardless of how they became EO.
  - This applies to all EO projects in the queue. Projects that have obtained a Partial Capacity Delivery Status may seek an allocation for the EO portion of the project.



#### TPD Allocation Process Modifications (continued)

- Allocation Group D will be discontinued.
- Criteria for allocating TPD to long lead-time projects will be based on exiting ISO tariff.
  - Appendix DD section 8.9.1 (b) and (c) stipulate the ISO will reserve TPD capacity for resources internal and external to the ISO that align with TPP approved transmission to meet specific CPUC portfolio requirements.
- Scoring criteria for ranking projects eligible to receive a TPD allocation will be developed later in IPE using the scoring criteria for the interconnection request intake process as input for a modified TPD allocation scoring criteria.
- The TPD allocation modification stakeholder process may continue beyond the IPE track 2 final proposal if necessary.



## CONTRACT AND QUEUE MANAGEMENT



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#### Queue Management topics to be removed from Track 2

- One-time withdrawal opportunity
- Removal of suspension rights



## Contract and Queue Management Limited Operation Study Updates

- Extend from 5 months to 9 months to submit a LOS request.
  - Cannot extend further due to less accurate operating information and risk of reliability of the system.
- Update BPM for Generator Management to clarify that a MMA request submitted with a LOS must be deemed complete and valid prior to the start of the LOS. If an MMA is submitted after a LOS is completed and the MMA results may impact the LOS, the LOS may need to be re-evaluated and potentially restarted.

#### Contract and Queue Management

- Revise Attachment 7 (SGIA) to be consistent with Appendix H (LGIA)
- TP Deliverability Transfer Limitations
  - Project transferring TPD will be withdrawn from the queue upon the approval of such transfer request.
  - ISO will forgo such withdrawal of the transferring project if the transferring project provides an Energy Only Power Purchase Agreement at the time of such transfer request.
  - TPD between resources/technologies within the same queue number is not considered a TPD transfer.

- Impose an unavoidable time-in-queue requirement for all projects to meet Commercial Viability Criteria (replace current CVC to retain TPD)
  - Per tables below for Cluster 14 and earlier, and 5 Years from Facility Study Results (defined in Order 2023) for Cluster 15 and later
  - Provide proof of having an executed PPA for RA/TPD or as EO.
    - TPD status/requirements must match the project's TPD status with the ISO.
    - If PTO extension cause loss of PPA, customer will be provided 12 months to execute a new PPA or demonstrate Shortlist, and
    - If Shortlist demonstrated, will have additional 12 months to execute PPA
  - Provide Financial Security Posting or Order 2023 Deposit
  - Demonstrate 100% Site Control
  - Have executed ISO GIA, and be in good standing
  - Provide detailed status and demonstration of the following as a baseline for annual progress to commercial operation:
    - Progress of GIA Milestones, list of all expected permits and their current status, Status of engineering, design, and construction activities of generating facility and upgrades, and status of major equipment procurement



- These CVC requirements do not rely on a project's commercial operation date, long-lead upgrade or procurement needs, long-lead development timelines (offshore wind, geothermal, etc.), or a project's TPD status.
- They do provide equal and reasonable time and flexibility to
  - seek and receive a TPD allocation,
  - park as needed,
  - execute an interconnection agreement,
  - seek and execute a power purchase agreement (whether for resource adequacy requiring TPD or for Energy Only), and
  - commence design, permitting, procurement, and construction activities.



### Contract and Queue Management Viability and Time-in-Queue (Annual Demonstration)

- Annual Demonstration of specific and distinct progress of:
  - All status' identified for CVC
  - GIA Milestones
  - Submittal of or approvals from regulating authorities for all necessary permits.
  - Status of engineering, design, and construction activities of generating facility and upgrades
  - Status of major equipment procurement

- Projects that meet CVC for only a portion of the project will be required to downsize to the capacity that meets CVC requirements.
- The ISO will assess whether the suspension will place the project beyond the tariff-prescribed terms.
  - If so, the project must comply with the CVC at the time it enters suspension. This will continue to avoid projects' using suspension to linger in queue while avoiding CVC requirements.
- Projects will not have an option to construct as a merchant plant or proceed without a PPA and proceed to construction without having met and continue to meet CVC requirements.
- Eliminate the monthly or quarterly status report submissions as established in the generator interconnection agreements and rely on the initial and annual demonstration of CVC for project status updates.



### **CVC** Requirements for active queue projects **GIA** Execution Requirement

	# Projects with unexecute d GIAs	MW Capacity at POI	IR Received Date (April)	7 years in queue	Years in Queue as of Nov. 2023	GIA Executed No Later Than:	Years- in- queue
Cluster 8 and prior	1	50	2015	2022	8.5+	June 30, 2025	10.2+
Cluster 9	3	450	2016	2023	7.5	June 30, 2025	9.2
Cluster 10	2	300	2017	2024	6.5	June 30, 2025	8.2
Cluster 11	6	921	2018	2025	5.5	June 30, 2025	7.2
Cluster 12	13	3915	2019	2026	4.5	Sept. 30, 2025	6.4
Cluster 13	46	12,117	2020	2027	3.5	Dec. 31, 2025	5.7
Cluster 14	204	65,506	2021	2028	2.5	April 30, 2026	5.0



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### **CVC Requirements for active queue projects CVC Demonstration Requirement**

	# Projects impacted	MW Capacity at POI	IR Received Date (April)	7 years in queue	Years in Queue as of Nov. 2023	Demonstrate all CVC No Later Than:	Years- in- queue	Months to demonstrate CVC after GIA execution
Cluster 8 and prior	49	7,377	2015 and prior	2022 and prior	8.5+	Dec. 31, 2025	10.7+	6 Months
Cluster 9	27	5,367	2016	2023	7.5	Dec. 31, 2025	9.7	6 Months
Cluster 10	21	6,501	2017	2024	6.5	Dec. 31, 2025	8.7	6 Months
Cluster 11	30	5,362	2018	2025	5.5	April 30, 2026	8.0	10 Months
Cluster 12	44	14,768	2019	2026	4.5	Sept. 30, 2026	7.4	12 Months
Cluster 13	60	16,323	2020	2027	3.5	April 30, 2027	7.0	16 Months
Cluster 14	204	65,506	2021	2028	2.5	April 30, 2028	7.0	24 Months



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<sup>\*</sup>FERC Order No. 2023 may impactor change the timeline for Cluster 14 GIA tendering and execution requirements

### Contract and Queue Management Modification Request Updates

- Increase deposit to \$30,000
- Increase time to complete engineering analysis from 45 days to 60 days
- Increase time to complete the FRR from 45 days to 60 days

#### **Process Updates**

- Work to host calls following the second or third validation turn.
- Coordinate with the PTOs to improve the initial and subsequent validation reviews for modification requests.
- Work to identify specific milestones such as executing the GIA or providing notice to proceed in the modification results.
- Update the BPM for Generator Management (Section 6.2.1.4) that projects must have started construction and be within *nine* (9) months of achieving their then-current synchronization or commercial operation date to submit a construction sequencing delay request.



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# Contract and Queue Management Earlier Financial Security Postings for Projects with Shared Upgrades

- Concern is shared upgrades are not getting started when the first project is ready potentially resulting in a delay for that project
- ISO Proposal
  - When the first GIA is executed, the parties to the shared network upgrade will be notified of the date of the Notice to Proceed
  - Once the first project provides a Notice to Proceed then the PTOs will notify all other project with the same shared network upgrade they need to post for the upgrade
  - Posting for the shared network upgrade would be due 60 90 days to post depending upon the status of the GIA
  - PTO would commence activity 30 days after receipt off the posting and funds



#### Contract and Queue Management Revise Timing of GIA Amendments to Incorporate Modification Results

- In the past 2 ½ years MMAs have resulted in potentially 376 amendments
- There is insufficient staff at the ISO and PTOs to keep up
- ISO Proposal
  - The MMA report(s) is a controlling document for change to the GIA and includes scope, schedule, and payments
  - Once the MMA report is published, work can begin based on that change
  - Nine months prior to synchronization the GIA will be amended to incorporate all MMA reports
  - NRI process will be aligned with this modification
  - Implementation of this revision is voluntary



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# Contract and Queue Management Commence Network Upgrades When the First Notice to Proceed is Provided to the PTO

- IC concern is that Notice to Proceed is provided to the PTO but the work doesn't begin potentially resulting in delay of the upgrade
- ISO Proposal
  - GIA include a specific date for Notice to Proceed and third posting
  - Once the Notice to Proceed and third security is received by the PTO, the PTO notifies the IC and ISO that activity has begun within 30 days of NTP and security posting



#### Implementation Deposit

- The PTOs include the development costs of projects in the GIA, the ISO is not currently reimbursed for its role in development of the projects, the market is paying
  - Queue Management, Regulatory Contracts, New Resource Implementation, Energy Data Acquisition and Full Network Model
- The ISO is proposing that upon execution of the GIA the IC provides a \$100,000 deposit for ISO grid connected and upon entering NRI the IC provides \$10,000 for WDATs which the ISO can charge for the actual implementation costs incurred
- The deposit will be kept in an interest baring account
- Any remaining deposit will be returned once the project achieves commercial operation



#### Phase Angle Data Requirements

- The ISO has found that the 30 samples per second of phase angle measuring units (PMU) is insufficient granularity to use in analysis of faults on the ISO controlled grid
- PMUs can be reprogramed to provide a more granular sample to allow more appropriate data for fault analysis
- ISO proposes the PMU resolution be revised to 16 samples per cycle.

### **NEXT STEPS**



#### IPE 2023 Track 2 Schedule

Date	Milestone			
2/8/2024	Draft final proposal posting			
2/15/2024	Stakeholder workshop on draft final proposal			
2/29/2024	Comments due on draft final proposal			
3/29/2024	Final proposal posting			
4/3/2024	FERC Order No. 2023 Compliance Filing			
4/4/2024	Stakeholder workshop on final proposal			
May 2024	Board of Governors Meeting			

The ISO is targeting May 2024 to present Track 2 to the Board of Governors.



#### Additional information

- Visit initiative webpage for more information: <a href="https://stakeholdercenter.caiso.com/StakeholderInitiatives/l">https://stakeholdercenter.caiso.com/StakeholderInitiatives/l</a> <u>nterconnection-process-enhancements-2023</u>
- If you have any questions, please contact isostakeholderaffairs@caiso.com

