

2023 Interconnection Process Enhancements Track 2 Working Group Meeting: Scoring Criteria

November 15, 2023

Housekeeping reminders

- This call is being recorded for informational and convenience purposes only. Any related transcriptions should not be reprinted without ISO's permission.
- These collaborative working groups 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.

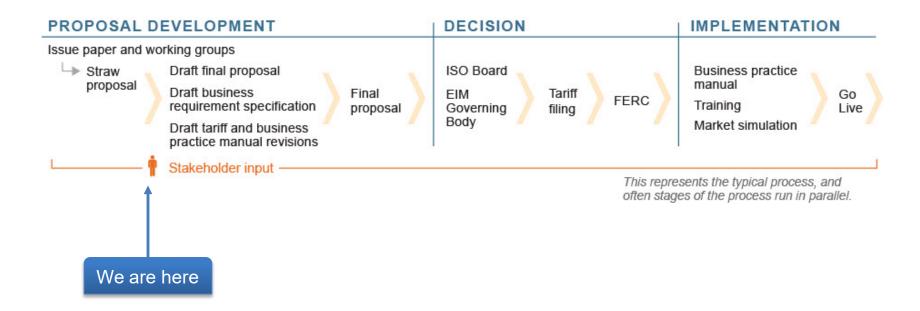


Instructions for raising your hand to ask a question

- If you are connected to audio through your computer or used the "call me" option, select the raise hand icon blocated on the top right above the chat window. Note: #2 only works if you dialed into the meeting.
 - Please remember to state your name and affiliation before making your comment.
- If you need technical assistance during the meeting, please send a chat to the event producer.
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CAISO Policy Initiative Stakeholder Process





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Agenda

Time	Topic
9:00 am – 9:15 am	IntroductionObjectives of scoring criteriaWorking group developments and expectations
9:15 am – 10:00 am	Initiative Update • Timeline
10:00 am – 12:00 pm	Review Scoring Elements • Stakeholder proposals
12:00 pm – 1:00 pm	Lunch
1:00 pm – 3:30 pm	Review Scoring ElementsIndividual Elements of the Scoring Criteria
3:30 pm – 4:00 pm	Summary and Next Steps



November 30, 2023 - Work Group Objectives

- Provide an initiative update to stakeholders
- Refine scoring criteria for accurate and objective indicators of project readiness



Initiative Update

- The ISO has received requests to extend the timeline of this initiative by 90 days to allow more time for stakeholder discussion.
- The ISO will extend the timeline to allow sufficient time to gather and refine the proposals based on stakeholder feedback.
- Next steps:
 - Revised Straw Proposal
 - Updates to key elements that have received significant stakeholder discussion and needed additional refinement
 - Informational workshop on the Zonal Approach after posting the Revised Straw Proposal
 - Stakeholder workshop on Revised Straw Proposal



Order No. 2023

- The ISO must comply with Order No. 2023 and will implement the proposals in IPE before re-engaging with the C15 interconnection request validation process and C15 studies.
 - We continue to plan to comply with the order as fully and as quickly as possible, within the timeframe currently required by FERC (April 3, 2023).
- The ISO proposes not to open an interconnection request window in 2024. The tariff requirements for such a cluster would be in flux, and additional queue volume would compound the challenges described below.
- It will be part of our compliance to apply Order No. 2023 to Cluster
 15, including the site control requirements.



STAKEHOLDER PROPOSALS



Stakeholder proposals

- Pre-queue entry information framework
 - Sushant Barave, Clearway
- LSEs' offtaker interest scoring category proposal
 - Presenter: Virginia Grosz, SCE
- Actionable, defined scoring criteria
 - Presenter: Jason Burwen, GridStor
- New criterion to prioritize projects with low DFAX values
 - Presenter: Brian Korpics, NewLeaf

Pre-Queue Entry Information Framework

Supported by

AES, Avantus, CalWEA, Clearway Energy Group, GridBright, GridWell Consulting, REV Renewables, Terra-Gen, Vistra Corp.

Why: Pre-queue entry information framework

- Granular, specific and contractable information about POIs made available adequately in advance of queue entry (ideally 9 months) will make CAISO's scoring criteria meaningful.
- CAISO's proposal of creating single-line diagrams identifying zonal boundaries, constraints and available TPD needs to be enhanced with interconnection feasibility information at substation level.
- Clarity on "what" information will be made available is critical before stakeholders can opine on the scoring criteria
- Points for offtaker-interest make sense only if adequate and contractable information is made available sufficiently in advance of the queue window opening. [Note: not all stakeholders supporting this discussion are in agreement with assigning points for offtaker interest]
- Without contractable interconnection information, the IPE proposal will simply be pushing
 the resource development bottleneck from interconnection queue to land/permitting.
 Compared to a rush to secure interconnection through an open and transparent process, a
 rush for land acquisition may adversely impact ratepayers.

What: Data that will make scoring criteria meaningful and implementable

- <u>Interconnection feasibility</u> at POIs identified in the CPUC portfolios and/or have high commercial interest. (E.g., available bays, need and ability to expand substation boundaries, feasibility of substation entry for gen-tie lines)
- <u>Deliverability:</u> Constraint mapping, deliverable amount (FCDS and interim), EO capability,
 DNUs (\$ and schedule) and incremental deliverability created by DNUs.
 CAISO has most of this information at constraint/gen-pocket level. Would be valuable to make it more granular.
- <u>Cost guidance</u>: \$/MW estimates for RNUs
- <u>Schedule guidance</u>: Estimated timelines for RUNs mainly to capture the known longest lead-time RNUs that set the right expectations for potential offtakers.

<u>How:</u> Recommended path to develop interconnection information database

- **<u>Timing</u>**: after TPD allocation for the current cluster and TPP approval of upgrades
- Baseline assumption: All queued projects that have received and retained deliverability (this will answer "capacity on top of what baseline?"); approved transmission upgrades.
- <u>Deliverability scan at all POIs</u> with commercial interest and/or in CPUC portfolio mapping; at each POI, provide deliverable MW without further upgrades, Cost and incremental MW capacity added by each DNU. Automation tools to model stressing study areas beyond the known constraints.
- Interconnection feasibility: Use past studies and the substation information to provide number of available bus positions, magnitude of IRNU cost. Possible to use publicly available per-unit costs for Interconnection Facilities and certain RNUs.
- <u>Cost and schedule for representative GRNUs</u>: Use past studies to provide expected GRNU and the magnitude of such GRNU cost.



Southern California Edison

LSEs' Off Taker Interest Scoring Category Proposal

Loïc Gaillac, Principal Manager, Contract Management, *Energy Procurement & Management* **Gene Lee**, Senior Advisor, Origination, *Energy Procurement & Management* **Virginia Grosz**, Senior Advisor, Origination, *Energy Procurement & Management*

November 15, 2023

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Agenda

- Overview of Updated Interest from Off-Taker
- LSE Point System Process
- Example of How LSE Could Gather Information about Projects
- LSE Point Allocation Methodology
- LSE Point Allocation Examples (based on various LSEs sizes)



Interest from Off-Taker

- Interest from off-taker section should account for no less than 20% of the total points.
- Interest from off-taker, as one of several scoring categories, is NOT a determinative category.
- Interest from off-taker can be gathered WITHOUT receiving LSE points

CAISO Proposal

- (A) Interest from off-taker [40%]: Letter of interest from a CA LSE or eligible commercial off-taker (40%)
- (B) Commercial readiness [Select One, Max=100%]: Shortlisted (40%), Preferred resource in an LRA-approved LSE's resource plan [60%], Executed term sheet for a PPA [60%], and Executed PPA 5yr + [100%]

Updated SCE Proposal

- (A) Interest from off-taker [Select One, Max=100%]:
 - 1. LSE's Preferred Selection [up to 60%]

OR

- 2. Contracting Status [Select One, Max=100%]:
 - a) Shortlisted [40%]
 - b) Preferred resource in an LRA-approved LSE's resource plan [60%],
 - SCE seeks clarification on CAISO's plan to automatically including projects that a non-CPUC jurisdictional LSE demonstrates is a preferred resource in its resource plan that has been approved by its Local Regulatory Authority. These projects should fall under this Contract Status category.
 - c) Load Serving Entity project serving its own load or meeting its regulatory requirement [100 %]
 - d) Executed PPA 5yr+ (with minimum posting) [100%]
 - i. SCE still strongly advocates to remove this requirement.
 - ii. As an alternative SCE proposes that the executed PPA points can only be awarded to PPAs with a provision that require developers to post a minimum of \$40/kW. This Development Security must be posted to the off-taker prior to submitting the IR application and **must remain posted** for the duration of the interconnection process. Project with executed PPAs who have not met this requirement get no points.



LSE Point System Mechanism: Process

How do LSEs gather project information?



How are the number of points an LSE is eligible for calculated?



How do LSEs assign points to projects?

Before the interconnection request application window opens, CAISO calculates the limited number of points/tokens that will be allocated to each LSE based on their load share across the CAISO footprint.

- 1. Additional data request are included in the CAISO interconnection application to support LSE assessment.
- 2. For LSEs that desire additional project information, an RFI (or similar information gathering mechanism) may be conducted ahead of the interconection application process.
- 3. Interconnection Customer submits to CAISO their interconnection application during the application window. CAISO seeks consent from IC and releases to LSEs a list of entity that submitted applications, as well as key application parameters (including specific LSE interest data).
- 4. LSEs processes information CAISO and from their RFI (if applicable) and prepares point allocations
- 5. Each LSE responds to the CAISO with a point allocation for selected applications within a specific time frame following the closure of the interconection application process.
- 6. CAISO add any LSE points to the scoring matrix.



Example of How LSE Could Gather Information about Projects

- In addition to the information obtained through the interconection application process, LSEs could for example use an RFI to specific information pertinent to each LSE.
- The intent of such an RFI is to identify applications that have the highest likelihood of resulting into an executed PPA with the LSE.
- Area for consideration that LSEs may leverage when evaluating applications could include Developer Attributes (e.g., developer's financial strength, experience) or Application/Project Attributes (e.g., technology type and maturity).
- Developers may need to provide an attestation that the info provided in the RFI matches what will be included in the interconnection request application.



LSE Point Allocation Methodology

Parameters	Value	Definition/Note
LSE Weighting Factor	35%	The percentage of total TPD available or planned capacity for which LSE can offer maximum point
Token Multiplier	50	Represent the maximum point allocation for LSE's Preferred Selection category (50 points in this case)
Total LSE Token Allocation	TPD Capacity x LSE Weighting Factor x Token Multiplier	Total LSE token allocated
Point Value (Token per MW)	1	You need 1 token per MW to award one point. Getting 50 points to a 100MW application requires 5,000 tokens
Maximum Token Allocation per LSE, per zone (% of LSE zone token)	25%	One LSE can only award 25% of its tokens in one single zone
Maximum LSE Load share to benefit from the maximum zone token allocation exemption	0.25%	For small LSE, an exemption insures that full token allocation can be used in one single zone



LSE Point Allocation Scenarios

Parameters	Value
TPD Total Capacity (MW)	45,000
LSE Weighting Factor	35%
Token Multiplier	50
Total LSE Token Allocation	787,500
Point Value (Token per MW)	1
Maximum Token Allocation per LSE, per zone	25%
Maximum LSE Load share to benefit from the maximum zone token allocation exemption	0.25%

Scenario	CAISO Load Share
Large LSE	30%
Medium LSE	10%
Small LSE	2%
Very Small LSE	0.1%

Case	Zone Capacity
Case 1	8,000MW
Case 2	1,500MW



LSE Point Allocation Example (Large/Medium LSE)

Maximum number of interconection applications eligible for maximum LSE points

Scenario	Large LSE	Medium LS	All LSE
CAISO Load Share	30%	10%	100%
Total Token Allocation	236,250	78,750	787,500
Case 1 – 8,000MW Zone			
Number of 500MW applications that could received 50 points	2 (+1 app with 18 pts)	0 (+1 app with 39 pts)	7 (+1 app with 44 pts)
Number of 300MW applications that could received 50 points	3 (+1 app with 47 pts)	1 (+1 app with 16 pts)	13 (+1 app with 6 pts)
Number of 100MW applications that could received 50 points	11 (+1 app with 41 pts)	3 (+1 app with 47 pts)	39 (+1 app with 19 pts)
Number of 050MW applications that could received 50 points	23 (+1 app with 31 pts)	7 (+1 app with 44 pts)	78 (+1 app with 37 pts)
Case 2 – 1,500MW Zone			
Number of 500MW applications that could received 50 points	2 (+1 app with 18 pts)	0 (+1 app with 39 pts)	7 (+1 app with 44 pts)
Number of 300MW applications that could received 50 points	3 (+1 app with 47 pts)	1 (+1 app with 16 pts)	13 (+1 app with 6 pts)
Number of 100MW applications that could received 50 points	11 (+1 app with 41 pts)	3 (+1 app with 47 pts)	39 (+1 app with 19 pts)
Number of 050MW applications that could received 50 points	23 (+1 app with 31 pts)	7 (+1 app with 44 pts)	78 (+1 app with 37 pts)
All Zones		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	· · · · · ·
Number of 500MW applications that could received 50 points	9 (+1 app with 22 pts)	3 (+1 app with 8 pts)	31 (+1 app with 25 pts)
Number of 300MW applications that could received 50 points	15 (+1 app with 37 pts)	5 (+1 app with 13 pts)	52 (+1 app with 25 pts)
Number of 100MW applications that could received 50 points	47 (+1 app with 12 pts)	15 (+1 app with 38 pts)	157 (+1 app with 25 pts)
Number of 050MW applications that could received 50 points	94 (+1 app with 25 pts)	31 (+1 app with 25 pts)	315 (+1 app with 0 pts)



LSE Point Allocation Example (Small/Very Small LSE)

Maximum number of interconection applications eligible for maximum LSE points

Scenario	Small LSE	Very Small LSE	All LSE
CAISO Load Share	1%	0.10%	100%
Total Token Allocation	7,875	788	787,500
Case 1 – 8,000MW Zone			
Number of 300MW applications that could received 50 points	0 (+1 app with 7 pts)	0 (+1 app with 3 pts)	13 (+1 app with 6 pts)
Number of 100MW applications that could received 50 points	0 (+1 app with 20 pts)	0 (+1 app with 8 pts)	39 (+1 app with 19 pts)
Number of 050MW applications that could received 50 points	0 (+1 app with 39 pts)	0 (+1 app with 16 pts)	78 (+1 app with 37 pts)
Number of 015MW applications that could received 50 points	2 (+1 app with 31 pts)	1 (+1 app with 2 pts)	262 (+1 app with 25 pts)
Case 2 – 1,500MW Zone			
Number of 300MW applications that could received 50 points	0 (+1 app with 7 pts)	0 (+1 app with 3 pts)	13 (+1 app with 6 pts)
Number of 100MW applications that could received 50 points	0 (+1 app with 20 pts)	0 (+1 app with 8 pts)	39 (+1 app with 19 pts)
Number of 050MW applications that could received 50 points	0 (+1 app with 39 pts)	0 (+1 app with 16 pts)	78 (+1 app with 37 pts)
Number of 015MW applications that could received 50 points	2 (+1 app with 31 pts)	1 (+1 app with 2 pts)	262 (+1 app with 25 pts)
All Zones			
Number of 300MW applications that could received 50 points	0 (+1 app with 26 pts)	0 (+1 app with 3 pts)	52 (+1 app with 25 pts)
Number of 100MW applications that could received 50 points	1 (+1 app with 29 pts)	0 (+1 app with 8 pts)	157 (+1 app with 25 pts)
Number of 050MW applications that could received 50 points	3 (+1 app with 7 pts)	0 (+1 app with 16 pts)	315 (+1 app with 0 pts)
Number of 015MW applications that could received 50 points	10 (+1 app with 25 pts)	1 (+1 app with 2 pts)	1050 (+1 app with 0 pts)



Questions?

Thank You

Please contact the SCE team for more information or questions:

- Virginia Grosz: virginia.grosz@sce.com
- Gene Lee: <u>Gene.Lee@sce.com</u>
- Loïc Gaillac: Loic.Gaillac@sce.com

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Gating & Scoring Criteria

- Created a list of gating & scoring criteria at time of Interconnection Request (IR) with broad input that meet key requirements
 - Are defined clearly minimizes interpretation
 - Can be operationalized minimizes administrative burden, relies on available information
- Broad input from a variety of IPP stakeholders does not represent group agreement, but a set of examples that keeps discussion moving forward
- Necessary to look at all screening mechanisms as a portfolio
 - Strong gating criteria can reduce work that scoring criteria need to do, and vice versa
 - Criteria regarding project viability can be assessed across both

Gating Criteria

- Could accomplish screening & reduce reliance on scoring criteria
 - Difficulty of workable scoring criteria has changed stakeholder opinions

CRITERION	REQUIREMENT(S)	Notes			
Indicators for Project Viab	Indicators for Project Viability				
	Demonstration of 90% site control	Required by Order 2023			
	Study deposits	Required by Order 2023			
	Assumption of withdrawal penalties	Required by Order 2023			
	Additional financial viability deposit	Non-refundable, credited towards PTO costs;			
		combined with study deposit amounts, creates			
		a ~\$2,000/MW deposit for all project sizes			

Additional Financial Viability Deposit detail

	Study Deposit (\$/project): required by Order 2023	Additional deposit (\$/MW): non-refundable, credited towards PTO costs	
IR>20MW IR<80MW	\$35,000+\$1,000/MW	\$300	
IR>=80 MW IR<200MW	\$150,000	\$750	
IR>=200MW IR<500 MW	\$250,000	\$1,250	
IR>=500MW IR<1000 MW	\$250,000	\$1,500	
IR>=1000 MW	\$250,000	\$2,000	

Illustrative Weighting

- Need to put relative weights on criteria to make sense of proposals
 - Need to also account for work that gating criteria do re: project viability

GridStor proposal:

- Indicators for system need: 40% of achievable points
 - Located in a Local Capacity Resource Area: 20%
 - Matching procurement plans/approvals: 20%
- Indicators of project viability: **40%** of achievable points
- Indicators of LSE interest: 20% of achievable points
 - Could LSE interest be used as a tie-breaker (instead of auctions)?

System Need Criteria: Local Capacity Resource

OPTION(S)	ASSESSMENT METHOD	ILLUSTRATIVE POINTS
Located in a Local Capacity Resource (LCR) area		20% Options additive up to points cap.
Where current CPUC PSP assumes resource retirements in LCR area	 ISO identifies list of retirements in CPUC-approved PSP in effect at time of opening of the IR window ISO matches retirements to LCR areas ISO determines if IR site (51+%) is inside a listed LCR area 	10%
Where local RA deficiencies identified in LCR area or sub-area	 ISO identifies list of LCR areas or sub-areas with local RA deficiencies, as described in the most recent Local Capacity Technical Analysis results for the 5-year case ISO determines if IR site (51+%) is inside a listed LCR area or sub-area 	10%
Where LSE or CPE has documented procurement challenges in LCR area	 ISO gets list from CPUC of LSE/CPE waivers for local RA procurement within 6 months of IR window opening ISO matches waivers to LCR areas ISO determines if IR site (51+%) is inside a listed LCR area 	10%
Would provide local RA within an LCR area on a 1:1 replacement basis	 ISO determines that IR has attributes that contribute to local RA and size is under 1:1 local RA replacement MW threshold for LCR sub-area, as described in the most recent Local Capacity Technical Study current year case 	10%
Provides local RA on a within an LCR area on a less than 1:1 replacement basis	 ISO determines that IR has attributes that contribute to local RA and size is over 1:1 local RA replacement MW threshold for LCR sub-area, as described in the most recent Local Capacity Technical Study current year case 	5%

System Need Criteria: Matches Procurement

OPTION(S)	ASSESSMENT METHOD	ILLUSTRATIVE POINTS
INDICATORS OF SYSTEM NEED Matches procurement plans/		20 % Options are additive up to points cap.
Meets current Local Regulatory Authority (including both PUC and n PUC) resource portfolio plan at the resource type and transmission zone level Meets current Local Regulatory Authority (including both PUC and n PUC) resource portfolio plan at the resource type and substation level	 IC attests the project meets both the resource type and transmission zone combination ISO reviews and validates match to the LRA plan ISO identifies the LRA resource portfolio resource type-substation combinations 	10%
Meets current CPUC procurement or requirement s additional to aforementioned resource plans (e.g. long lead time resources)	requirements	10%
Matches current non-PUC Local Regulatory Authority approved procurement plans for specific proje	 IC requests documentation from LRA that IR is in approved procurement plans for specific projects IC submits that documentation to ISO ISO reviews and validates match 	20%

Project Viability Criteria

OPTION(S)	ASSESSMENT METHOD	ILLUSTRATIVE POINTS
INDICATORS OF PROJECT VIABILI	TY	40% Options additive up to points cap.
Demonstration of business partnerships for future supply of major equipment prior to COD	 IC submits affidavit of MSA or other existing business relationship with suppliers of prime mover & major high-voltage equipment ISO validates affidavit 	10%
5% engineering design	 IC submits engineering design plan, including site plan and single line diagram ISO validates that plan exceeds 5% threshold 	5%
Description of critical issues and plan to address/mitigate (i.e. site screen)	 IC submits report by independent third-party that identifies critical permitting issues and potential remedial actions ISO validates third-party is an approved provider of such reports ISO confirms report indicates path to resolution of any identified issues 	5%
Expansion of existing facility where existing Gen-Tie/POI/substation has sufficient surplus to accommodate additional resource	 IC submits information indicating that new IR uses same or directly adjacent site from existing facility ISO identifies whether gen-tie/POI/substation of IR is sufficient capacity without more than de minimus upgrades 	10%
Use of a previously disturbed site	 IC submits documentation that new IR uses previously disturbed site (including both in power sector and for uses beyond power sector) ISO identifies whether substation of IR is sufficient capacity without more than de minimus upgrades 	5%
Located in an energy community as defined by Internal Revenue Service guidance in the Inflation Reduction Act	ISO matches project geography to most recent IRS-issued map to validate location	5%

LSE Interest Criteria

OPTION(S)	ASSESSMENT METHOD	ILLUSTRATIVE POINTS
INDICATORS OF LSE INTEREST		20%
LSEs award points to IRs based on IS approved criteria	procurement orders the LSE proportions (% of MW) ISO allocates points equal to 10 times 20% of achievable points (e.g., if total points achievable for a single project is 200, then	Points allocated to LSEs by proportion of MW in existing procurement orders LSEs assign points (up to 20% of achievable points for a single IR) as desired to IRs

 Recommend any approach be determinative for a small proportion of projects



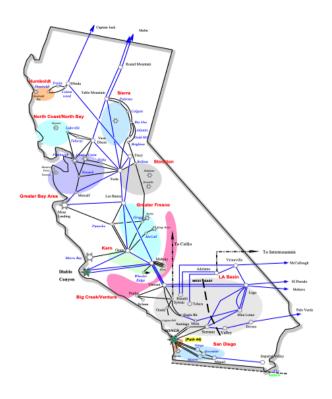
Brian Korpics
Director of Policy and Business Development



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New Criterion to Prioritize Projects with Low DFAX Values



New Leaf proposes creation of a new scoring criterion to prioritize projects with low DFAX values.

The CAISO could rank all projects in a zone according to their DFAX values relative to known, binding constraints and/or Flow Impact and then award points to projects in different tranches.

For example, the CAISO could provide 20 points to the top 5% of projects; 15 points to the top 5-10%; 10 points to the top 10-15%; and 5 points to the top 15-20%.

This proposal would allow the CAISO to:

- 1) Select projects that utilize less available capacity relative to other projects in a given study zone;
- 2) Increase the volume of MWs that can receive deliverability and participate in the RA program without transmission upgrades; and
- 3) Maximize the deliverability/RA benefits from newly approved upgrades.





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2023 Interconnection Process Enhancements Track 2 Working Group Meeting

November 15, 2023, 9 a.m. – 4 p.m. PST

LUNCH BREAK

We are currently on a lunch break, returning at 1:00 p.m. If you have any questions, please contact Kaitlin McGee at kmcgee@caiso.com or (279) 219-3912.

ISO Proposed Working Revisions

SCORING CATEGORIES



Offtaker Interest and Commercial Readiness

- Letter of interest from a California LSE or eligible offtaker
- LSE points allocation
 - Need more information on process
- Shortlisted with a California LSE or eligible commercial offtaker
- Included as a preferred resource in an LRA-approved LSE's resource plan
- Executed term sheet for a PPA
- Executed PPA of a minimum term five years (more discussion)



Interest from non-CPUC jurisdictional LSEs

 With any scoring process, the ISO proposes to automatically include any project that a non-CPUC jurisdictional LSE demonstrates is a preferred resource in its resource plan that has been approved by its Local Regulatory Authority.



Incremental Site Control Adders (beyond 90% site control required at time of IR submittal)

- 100% Site control
- 50% Site control to POI
- 100% Site control to POI



Permitting

- Indication of community support
- Application of land use permit
- Initiation of California Environmental Quality Act (CEQA) review or application for AB 205 expedited environmental review of eligible projects filed
- Conditional use permit (CUP) granted [or demonstration of alternative permitting]



Project Attributes

- Ability to provide Local Resource Adequacy (RA) in an LCRA with an ISO demonstrated need for additional capacity in that local area
- Meets the requirements of a current CPUC procurement order or non-jurisdictional LSE's Request for Proposals



Project location

- Energy community as defined by Internal Revenue
 Service guidance in the Inflation Reduction Act
- Location in load pockets not needing Area Delivery Network Upgrades



Expansion on an operational facility

- Expansion of an existing facility with no additional permitting required
- Expansion of an existing facility where the existing Gen-Tie already has sufficient surplus capability to accommodate the additional resource



SUMMARY AND NEXT STEPS



Additional information

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

