April 30, 2015

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: California Independent System Operator Corporation
Docket Nos. ER08-1317-003 and ER11-1830-000
Interconnection Queue Quarterly Progress Report, Q1 2015

Dear Secretary Bose:

Pursuant to the Commission's orders in the above-captioned dockets, the California Independent System Operator Corporation ("CAISO") herby submits for filing its interconnection queue quarterly progress report for the first quarter of 2015.[1] Because the Commission has yet to rule on the CAISO's October 30, 2014 motion for relief from this reporting requirement, the CAISO is filing this progress report in the same format as the Q3 2014 progress report and including the CAISO's current generator interconnection queue spreadsheet, which contains more information than the standard report.[2]

Please contact the undersigned if you have any questions,

Respectfully submitted,

By: *<u>/s/ William H. Weaver</u>*

Roger E. Collanton
General Counsel
Sidney L. Mannheim
Assistant General Counsel
William H. Weaver
Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel.: (916) 608-1225
Fax: (916) 608-7222
bweaver@caiso.com

[1] California Independent System Operator Corp., 124 FERC ¶ 61,292 (2008) ("CAISO 2008"); California Independent System Operator Corp., 133 FERC ¶ 61,223 (2010) ("CAISO 2010")

[2] The generator interconnection queue spreadsheet also is available on the CAISO's public website at http://www.caiso.com/planning/Pages/GeneratorInterconnection/Default.aspx .

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System Operator Corporation	Docket Nos. ER08-1317-003 ER11-1830-000

CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION INTERCONNECTION QUEUE QUARTERLY PROGRESS REPORT Q1 2015

Quarterly Reporting Period:
January 1 – March 31, 2015

Deborah A. Le Vine
Director, Infrastructure Contracts & Management
California Independent System Operator Corporation

Date: April 30, 2015

I. INTRODUCTION AND DISCUSSION OF THE REPORTING REQUIREMENTS GIVING RISE TO THIS REPORT

This report describes the ISO's progress over the period January 1, 2015 to March 31, 2015 in processing generator interconnection requests under the ISO's interconnection process.

The two primary sets of procedures under which the ISO is processing interconnection requests today are: (a) ISO Tariff Appendix Y, called the "Generator Interconnection Procedures ("GIP")[1]; and (b) ISO Tariff Appendix DD, the "Generator Interconnection and Deliverability Allocation Procedures ("GIDAP"). The GIP applies to the transition cluster through cluster four, and the GIDAP applies to cluster five and subsequent cluster studies.

The GIP and GIDAP combined govern all interconnection requests in the clusters to which they apply, regardless of whether the proposed facility is a large generating facility or a small generating facility. Under either the GIP or the GIDAP, an interconnection request is processed under one of three tracks:

(1) The cluster study process track, which serves as the primary processing method and the default interconnection process;
(2) The independent study process track, under which certain projects can be studied independently if they are determined to be electrically independent from other projects in the cluster study (and demonstrate the ability to complete non-ISO development milestones (like licensing) sooner than typical development timeframes); and

[1] The ISO OATT, ISO Tariff Appendix Y can be accessed on the ISO's website at http://www.caiso.com/Documents/AppendixY_GIPForInterconnectionRequests_Sep1_2014.pdfand ISO Tariff Appendix DD can be accessed on the ISO's website at http://www.caiso.com/Documents/AppendixDD_GeneratorInterconnectionAndDeliverabiltyAllocationProcess_Sep1_2014.pdf

(3) The fast track process track, which is available for projects of up to 5 MW, when it can be determined, through a limited evaluation methodology, that the project can be interconnected with no upgrades or with *de minimis* upgrades.

As explained in later sections of this report, the ISO is also processing some previous interconnection requests under prior "serial" interconnection tariff processes.

Background Regarding the Quarterly Reporting Requirements

The reporting requirements giving rise to this report originate with the Commission's orders approving the ISO's 2008 GIPR Amendment and the later 2010 GIP Amendment. In 2008, the ISO revised its Large Generator Interconnection Procedures ("LGIP") to change from a serial approach to a cluster approach. The ISO called this tariff amendment "Generator Interconnection Process Reform (GIPR)." The ISO refers to this revised LGIP as the "Cluster LGIP." The Commission's September 2008 Order accepting the GIPR Amendment included a requirement to file quarterly status reports on the ISO's progress in processing interconnection requests under the cluster approach.[2] The Commission intended the quarterly reports to serve as a tool to evaluate how well the ISO's cluster process is working.

In the December 2010 Order accepting the GIP (which the ISO now calls GIP Phase 1, after the ISO undertook another process called GIP Phase 2 in 2011), the Commission directed the ISO to include additional information within the quarterly status reports concerning the independent study process ("ISP") and fast track process. For the ISP, the Commission directed the ISO to include information about the number of projects requesting interconnection through the ISP, the outcome of those requests, the complete length of time for recently completed ISP interconnection studies (from initial

[2] *California Independent System Operator Corp.*, 124 FERC ¶ 61,292, at P 200 (2008) ("September 2008 Order"). The September 2008 Order also required the ISO to file two comprehensive status reports, one pertaining to the transition cluster and one pertaining to the first cluster. The ISO filed its first comprehensive report on the transition cluster on January 31, 2011.

application through final approval), and the reason for any rejections of projects requesting ISP treatment.[3]

With respect to the fast track process, the Commission directed the ISO to include in its reports the size and type of generator interconnection requested under the fast track process, the proposed location of the generator, the number of requests that did not pass the screens, and which screens the generator developer failed.[4]

This report is the ISO's twenty-third quarterly report.

The ISO Continues to Refine Its Generation Interconnection Process

As the Commission is aware, since 2008, the ISO has worked with stakeholders to continue to refine its interconnection process. Most recently, the ISO commenced its Interconnection Process Enhancements (IPE) stakeholder initiative called for in 2015. The IPE 2015 initiative began with the publication of an Issue Paper and Straw Proposal on March 23, 2015.[5] A stakeholder call on the proposal was held on March 30, 2015. There are eleven topics included in the IPE 2015 initiative including clarifications on several aspects of the interconnection process, more stringent time-in-queue limitations, and changes to the timelines for generator interconnection agreement negotiations and execution. The current timeline for this initiative seeks to bring a proposal to the CAISO Board of Governors in September 2015 and filing proposed Tariff language soon thereafter.

These efforts are part of a continual commitment by the ISO to refine and improve the process and to respond to the dramatic increase in interconnection requests in response to California's renewable portfolio standards ("RPS") policy, which mandates that Load Serving Entities satisfy their load requirements from 33% renewable

[3] *California Independent System Operator Corp.*, 133 FERC ¶ 61,223, at PP 1, 97, 117 (2010) ("December 2010 Order").

[4] *Id.* at P 117.

[5] Stakeholder material related to the Interconnection Process Enhancements (IPE) 2015 initiative are available on the CAISO website at http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements2015.aspx

energy sources by 2020.[6]

The ISO's Interconnection Queue[7]

Two legacy serial groupings[8]

- Amendment 39 Procedures (A39) These projects that predated the serial study group. These requests were grouped together because, at the time the ISO made its 2008 waiver request which was a foundational step to establishing the Cluster LGIP, the associated interconnection studies for these projects had already been completed.[9]

  The governing tariff provisions for each project under this component depend on the date that the interconnection customer submitted its interconnection request. If that date was before July 1, 2005, the governing provisions are those set forth in ISO Tariff Appendix W, *Interconnection Procedures in Effect Prior to July 1, 2005*, also known as the "Amendment 39 Procedures." If the submittal date was on or after July 1, 2005, then the applicable provisions are those set forth in ISO Tariff Appendix U, *Standard Large Generator Interconnection Procedures (LGIP).*

- Serial projects (Serial) These projects still needed interconnection studies to be completed at the time the ISO categorized interconnection requests and filed its 2008 request for tariff waiver that preceded the 2008 GIPR Amendment.

  For all requests in this grouping, the applicable process is set forth in ISO Tariff Appendix U, *Standard Large Generator Interconnection Procedures*

[6] SBX1-2 enacted by the California Legislature and signed by Governor Brown in April 2011 codified California's 33% RPS. Prior to this time, the 33% standard was a function of Governor Schwarzenegger's Executive Order S-21-09 signed in September 2009, which required the California Air Resources Board to adopt a 33% renewable energy requirement by 2020 to implement California's greenhouse gas law (AB 32).

[7] The Commission's orders relating to queue reporting require the ISO to report on the cluster component of the ISO interconnection queue and the ISP and Fast Track processes. Nevertheless, the ISO has made a practice of including the legacy interconnection requests as well as requests in the SGIP serial study and transition cluster groups in its reporting, so that each report would cover the entire ISO generator interconnection queue.

[8] In the listing below, Component 1 generally consists of that group of interconnection requests that are older in time than the interconnection requests under Component 2. However, this is not exactly so, as the groupings were also based on common characteristics (*e.g.*, studies that were already completed) that make collective treatment of the individual requests within the group more logical. This means that some interconnection requests that were older in time are part of Component 2 rather than Component 1.

[9] *See, e.g.*, Q1 2009 Report at p. 1for discussion of the ISO's 2008 waiver petition.

(LGIP), which contains the procedures which immediately preceded the implementation of the Cluster LGIP.

- ***ISO Clusters governed by the GIP***

For the grouping of the cluster interconnection requests up through and including cluster four, the applicable interconnection procedures are set forth in ISO Tariff Appendix Y, *Generator Interconnection Procedures (GIP) for the Interconnection Requests*.

- LGIP Transition Cluster (LGIP-TC). requests received prior to June 2, 2008 that were transitioned to the Cluster LGIP.

- Cluster 1 (C1). the first group of interconnection requests received during an open request window (June 2, 2008 to July 31, 2009).

- Cluster 2 (C2). the second group of interconnection requests received during an open request window (October 1, 2009 to January 31, 2010).

- Cluster 3 (C3). the third group of interconnection requests received during an open request window (March 1, 2010 to July 31, 2010).

- Cluster 4 (C4). the fourth group of interconnection requests received during the open request window (March 1-31, 2011).[10]

- ***ISO Clusters Governed by the GIDAP***

Clusters after cluster four are governed by ISO's GIDAP procedures, as set forth in ISO Tariff Appendix DD.

- Cluster 5 (C5). the fifth group of interconnection requests received during the open request window (March 1-31, 2012).

- Cluster 6 (C6). the sixth group of interconnection requests received during the open request window (April 1-30, 2013).

- Cluster 7 (C7). the seventh group of interconnection requests received during the open request window (April 1-30, 2014).

[10] Under the Cluster LGIP, the fourth cluster window opened on October 1, 2010 and was set to close on January 31, 2011. However, while the window period was opened, the GIP became effective. Under the GIP, a further fourth cluster window was opened during the month of March (March 1-31, 2011). All earlier fourth cluster applications received during 2010 are being processed together with the cluster track applications received during the March 2011 window period.

- ***Customers Governed by GIP Tracks Other than the Cluster Track***

o Independent Study Process (ISP). ISP interconnection requests can be submitted at any time. This component tracks ISP projects received from the inception of the ISP on December 19, 2010 through the end of the reporting period. It is important to note that the ISP is available to projects of any MW size. Accordingly, this component will be composed of both large and small generators. The independent study for these projects is done as energy-only. If an ISP project desires to have full-capacity deliverability status, then the deliverability study is done in the next deliverability study that the ISO performs as part of a cluster process in the Phase II interconnection study process.

o SGIP Serial Study (SGIP) and SGIP Transition Cluster. On December 19, 2010, the effective date for revised GIP Appendix Y, there were 128 active projects in the queue for the Small Generator Interconnection Process (SGIP). The ISO sent a notice to all SGIP interconnection customers whose projects were eligible to remain in the SGIP serial process, to inform them that they had an option to move their projects into the new SGIP transition cluster and be studied as energy-only in the combined Phase II interconnection studies that the ISO is conducting for LGIP Cluster 1 and Cluster 2.11.

o Track Process (Fast Track). The Fast Track is available to projects up to 5 MW in size. Fast Track interconnection requests can be submitted at any time. This component tracks Fast Track projects received from the time the Fast Track process was revised on December 19, 2010 through the end of the reporting period.

Every two weeks the ISO publishes detailed information on the projects in the interconnection queue on the ISO public website at:

http://www.caiso.com/planning/Pages/GeneratorInterconnection/Default.aspx

The spreadsheet can be accessed directly at:

http://www.caiso.com/Documents/ISOGeneratorInterconnectionQueueExcel.xls.

A PDF version of the document is available at

http://www.caiso.com/Documents/ISOGeneratorInterconnectionQueue.pdf.

The document is separated into three tabs:

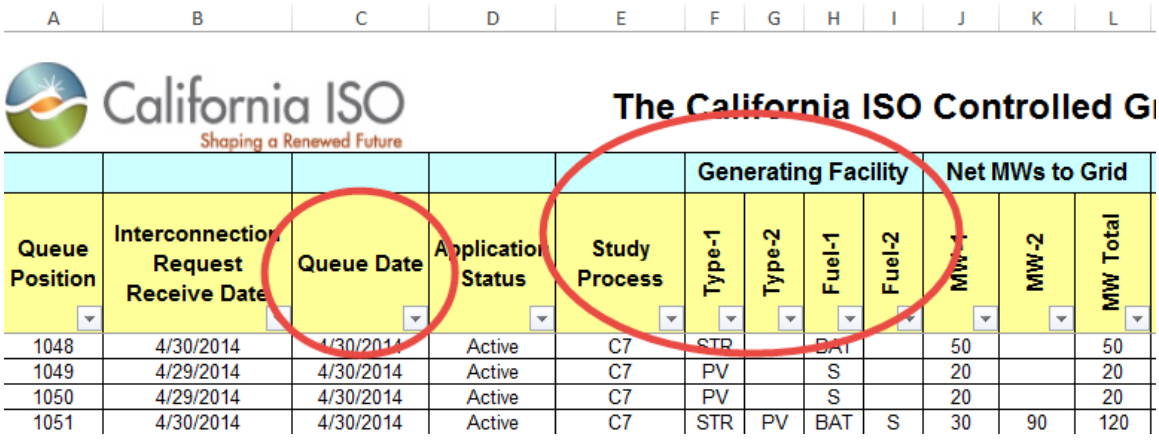
[11] See Appendix 8 to Appendix Y.

1. "Active Generation Projects" are projects in the ISO interconnection queue that are active and have not yet declared commercial operation for the project's Interconnection Request
2. "Completed Generation Projects" are projects studied in the interconnection queue that have declared commercial operation for their entire Interconnection Request. (Column S of this tab, "Actual Online Date" contains the dates that the Projects declared COD)
3. "Withdrawn Generation Projects" are projects studied in the interconnection queue that have been withdrawn from the ISO interconnection queue (Column D of this tab "Application Status" contains the date the Project withdrew from the ISO interconnection queue)

As illustrated in Image 1 below, all three tabs of the document contain detailed information on the projects' size, type, technology, deliverability status, location, and progress through the queue, including the following components:

- Column C, "Queue Date" indicates the date the Interconnection Request was deemed complete, which is the day the project is considered to have entered the queue.
- Column E, "Study Process" can be used to organize, filter, and view projects by study process.
- Columns F and G "Generating Facility Type-1" and "Generating Facility Type-2" contain the projects' prime mover technology.
- Columns H and I "Generating Facility Fuel-1" and "Generating Facility Fuel-2" contain the projects' fuel type for the technology.

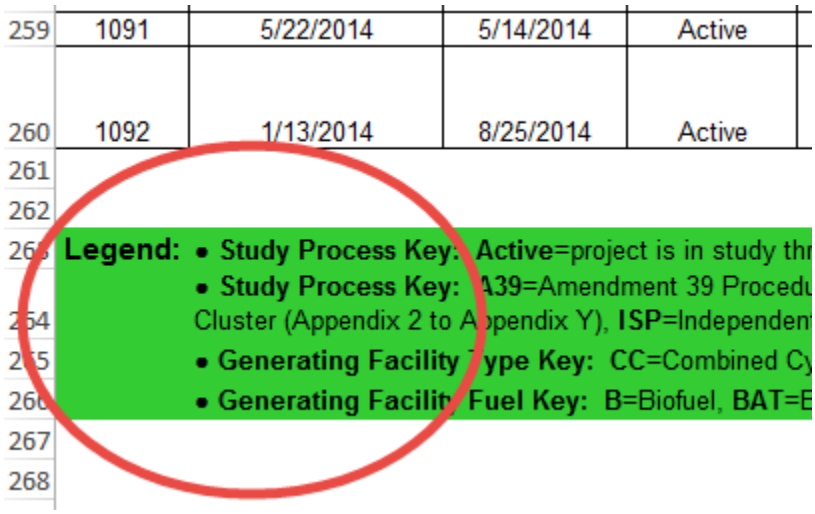
Image 1



A	B	C	D	E	F	G	H	I	J	K	L
California ISO Shaping a Renewed Future					The California ISO Controlled G						
					Generating Facility				Net MWs to Grid		
Queue Position	Interconnection Request Receive Date	Queue Date	Application Status	Study Process	Type-1	Type-2	Fuel-1	Fuel-2	MW-1	MW-2	MW Total
1048	4/30/2014	4/30/2014	Active	C7	STR		BAT		50		50
1049	4/29/2014	4/30/2014	Active	C7	PV		S		20		20
1050	4/29/2014	4/30/2014	Active	C7	PV		S		20		20
1051	4/30/2014	4/30/2014	Active	C7	STR	PV	BAT	S	30	90	120

The document also contains a legend for the phrases and acronyms used to identify the spreadsheet's tabs and columns, as illustrated in Image 2:

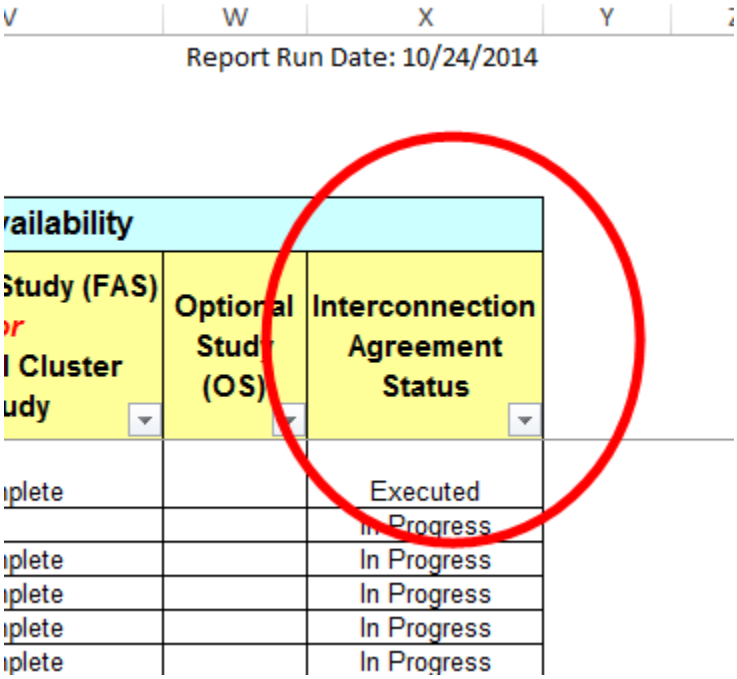
Image 2



259	1091	5/22/2014	5/14/2014	Active
260	1092	1/13/2014	8/25/2014	Active
261				
262				
263	**Legend:** • **Study Process Key:** **Active**=project is in study thr			
264	• **Study Process Key:** A39=Amendment 39 Procedu			
265	Cluster (Appendix 2 to Appendix Y), **ISP**=Independen			
266	• **Generating Facility Type Key:** CC=Combined Cy			
267	• **Generating Facility Fuel Key:** B=Biofuel, BAT=E			
268				

As illustrated in Image 3 below, all three tabs of the document contain detailed information on the projects' that have executed Generator Interconnection Agreements or the GIAs are in progress:

Image 3



V	W	X	Y	Z
		Report Run Date: 10/24/2014		
vailability				
Study (FAS) or I Cluster udy	Optional Study (OS)	Interconnection Agreement Status		
plete		Executed		
		In Progress		
plete		In Progress		
plete		In Progress		
plete		In Progress		
plete		In Progress		

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 30th day of April 2015.

/s/ Anna Pascuzzo

Anna Pascuzzo