

**Comments of the California Wind Energy Association
on CAISO's August 23, 2007
Draft Proposal for Remote Resource Interconnection**

September 5, 2007

The California Wind Energy Association ("CalWEA") appreciates the opportunity to comment on the CAISO's August 23, 2007, "Draft Proposal for Remote Resource Interconnection" ("Draft Proposal"). We offer here the general and specific comments that CAISO staff invited during its August 30 conference call. Section I contains our general comments. We offer in Section II more specific comments and suggestions addressing our concerns. In Section III, we provide specific language suggestions. We hope these suggestions will enable CAISO to better achieve its intent and the spirit of the RRI policy.

I. General Comments

- A. CalWEA fully supports the RRI policy as a financing tool that can play an important role in overcoming barriers to the transmission-infrastructure development needed to support renewable energy development in certain cases. The Draft Proposal is of concern to CalWEA because it suggests that clustered renewable resources will be directed toward RRI facilities rather than comprehensive transmission solutions that simultaneously address reliability and economic opportunities on the grid, which are likely to lead to network upgrades. We urge the CAISO to revise the RRI proposal to clarify that the RRI mechanism will be used only *as needed* in the application of the CAISO's sound transmission planning and interconnection policies and practices.

These broader policies and practices are expected to evolve, through the Order 890 compliance filing, into a more efficient and comprehensive transmission planning process. CalWEA is participating in that process and expects that its outcome will promote the development of transmission infrastructure needed by renewables. The RRI policy should not be seen as fundamentally changing sound transmission planning policies and practices; rather, it should be seen as "a tool in the box," available to be applied as part of exercising sound transmission planning practices. As reflected in the changes we propose below, we expect such an approach to require many fewer new policies and procedures than the Draft Proposal now anticipates, enabling simplification of the CAISO's RRI tariff filing.

Given the relationship between the overall planning process and the RRI, and the fact that the Draft Proposal refers to policies still in development, we encourage CAISO to consider combining the RRI stakeholder process, and tariff language development process, into its FERC 890 stakeholder process. At a minimum, we urge the CAISO to closely coordinate the two efforts.

- B. We very much appreciate the statement (Section 3.2, p.6) that the CAISO plans to propose modifications to the LGIP provisions of the tariff to allow for retroactive clustering of queued generation projects. Retroactive clustering is essential to efficiently study and plan for these resources, and to relieve the enormous queue backlog that has caused many projects to wait far beyond the tariff's required study timeline.

Many stakeholders believe that these long delays have virtually ground the entire CAISO LGI process to a halt, and they are contrary to the intent behind FERC's requirement for stated timelines in the LGIP study process. These delays also leave the CAISO open to complaints on these grounds at FERC, and they underlie our concerns about diversion of scarce CAISO resources to studies and other activities outside its own planning process.

We believe that FERC will agree with a retroactive clustering provision of the CAISO tariff if it is presented as part of the CAISO's broader policies and practices for interconnection studies within its FERC 890 compliance filing. However, to relieve more quickly the enormous interconnection studies backlog, we encourage the CAISO to separately and immediately file for this modification.

II. Specific Comments

A. ERAs should be defined primarily by queued resources.

1. ERAs should be primarily defined by those groups of queued resources eligible for clustered studies and which have made any applicable payments associated with being included in a clustered study. There are almost 40,000 MW of renewable projects in the queue (enough to serve about 40% of California's energy needs), 83% of which are concentrated in four counties (San Bernardino, Kern, Imperial, and Riverside). Resource clusters in the queue provide the clearest and most substantial picture of concentrated renewable resource areas with commercial potential.

The projects in the queue reflect significant investments by the private sector in identifying promising resource areas. The associated companies have studied the resource quality at the proposed site, are seeking to acquire or have acquired land control, and have paid or will pay substantial sums for the necessary interconnection studies. Therefore, the interconnection queue must be used as the most important factor for determining ERAs, and for assessing the viability of either Network Upgrades or RRIFs to facilitate their interconnection.

2. Looking beyond the queue to identify ERAs conflicts with the LGIP process, at least until the CAISO is up to date in performing the required studies for queued projects, given that the CAISO is not meeting the tariff's required study timelines. CalWEA believes that replacing queue-derived ERAs with ERAs developed based on other criteria, as the Draft Proposal seems to

advocate, will be inequitable to those companies who have followed approved existing procedures, and could divert CAISO's resources from attending to the existing backlog.¹

Moreover, given the RRIF requirement for a demonstration of substantial commercial interest, as evidenced by signed LGIAs and other criteria under consideration, looking outside the queue for ERAs could either: (1) lead to designation of ERAs where RRIFs could not qualify; or (2) of greater concern to CalWEA, undercut the already-strong market process by allowing new projects, motivated by the ERA designation, to jump ahead of already-queued projects in other areas with already-demonstrated commercial potential.

3. For the same reasons, CAISO should not implement a "pre-designation mechanism" whereby a specific proposed RRIF associated with a particular ERA, defined on criteria other than the consideration of the current interconnection queue, could be "pre-designated" early in the development process as eligible for the financing treatment before having to clear the commercial interest hurdles (i.e., the LGIAs). Without studying an ERA in a broader transmission-planning context, it is not possible to conclude that an RRI facility is appropriate. In addition, it would not be fair to developers in the queue that have invested substantial resources in the queue process for the CAISO to provide RRI eligibility to non-queued and, hence, largely "fictitious" commercial resources.
4. The CAISO must undertake itself the process of designating ERAs, and should verify the viability of and adherence to its own planning criteria those ERAs suggested by others. FERC did not require in its Declaratory Order that ERAs be designated by a non-CAISO-lead process. FERC responded to the CAISO's proposal in that regard and required (at para. 90) the CAISO to make clear, in its tariff provision, how these areas would be selected. There is no reason to expect that FERC would object to use of the queue as the primary basis for designation of ERAs -- in fact, it should be the only basis for designation of ERAs at least until the current interconnection queue backlog is resolved.
5. If the CAISO allows project areas that do not qualify for cluster studies to be proposed for study in the open season process, CAISO must ensure full and fair consideration of stakeholder comments in its own planning process of

¹ At this early stage, it is unclear whether the CRETI-proposed resource areas will be drawn from the queue. If they are, CRETI's proposals will be consistent with our suggested principle. If CRETI's proposals are not drawn from the queue, they can still play a role by drawing projects into the queue in promising resource areas that it may identify, which will lead to eligibility for clustered studies and ERA designation. As at least 25% of the RRI facility capacity will have to have LGIAs, plus an "additional interest" -- possibly queue positions -- representing 35% of the capacity, ERA projects will need to be queued eventually.

such proposals (whether from CRETI or any other outside group or process), to: (1) effectuate CAISO's stated intent that stakeholders not be forced to participate in multiple forums in order to have a voice; and (2) allow parties that could not participate in CRETI or other outside groups or processes, for whatever reason, an opportunity to comment and offer alternatives.

For example, CalWEA or other interested parties may not have the resources to participate in CRETI, as well as participate in the CAISO planning process and carry out their other responsibilities. We must look to the CAISO to provide an independent opportunity for our opinions on the results to be voiced and considered, to the extent that CAISO plans to use those results in its planning process.

6. The CAISO asked what should be required to demonstrate additional interest to support the commencement of construction of an RRI facility, aside from LGIAs at the minimum 25% level. In keeping with the above, a showing of "additional interest" should be consistent with the queue process, i.e., based primarily on filed queue applications and, if there is no LGIA yet, payment for system impact studies (or a portion of clustered studies). The CAISO should not seek additional deposits, since deposits are already made in the queue process.

As a secondary indicator, the CAISO could look to control of the land (not land "ownership" as the ISO suggests). As to whether PPAs should count, we agree with the CAISO's inference that not all PPAs are created equal; different terms can make them more or less likely to result in actual project development. However, PPAs are a good indicator of commercial potential. If a PPA has been entered into under a California IOU's RPS solicitation, the PPA should be presumed to be acceptable, as the PPA will have been developed using the CPUC's standard contract terms and conditions and the IOUs have demonstrated through their record of obtaining CPUC approval that these PPAs, generally speaking, are reasonable. If a PPA was not entered into under such a solicitation, the ISO should review the PPA to ensure, or ask the proponent of the PPA to verify, that the PPA meets certain minimum conditions. These conditions could be (i) that there is no unrestricted right of either PPA party to terminate the contract purely for convenience and without any liability (as opposed to in the event that a key assumption - such as tax credit availability - is not satisfied); (ii) that the PPA has a minimum term of ten years, which corresponds to a fairly common assumption as to the minimum term needed to support the financing of a new generating facility; and (iii) that the developer has either a proven track record of successfully completing projects or has provided financial credit support to back its obligation to complete the project.

B. ERAs should not be presumed to require non-network solutions.

1. The proposal should be revised to ensure that ERAs will be broadly studied for the most efficient interconnection solutions, including Network Upgrades; an

RRI should be selected only if it is the most efficient solution, or part of the most efficient solution. The proposal currently reads as though ERAs will be channeled into non-network RRI solutions, regardless of whether consideration of economic opportunities and reliability needs would identify more efficient network transmission solutions.

2. Network solutions should be sought, even if on the surface they may appear to cost more than an RRIF, because the added reliability and economic benefits may warrant such additional expenditure, for several reasons.

First, as we found in Tehachapi, transmission proposals that simultaneously address multiple system needs are likely to be more efficient than piecemeal solutions.² CAISO cannot determine whether an RRI will be part of the most efficient solution before conducting cluster studies as part of the overall transmission process.

The CAISO should not require (e.g., in proposed Section 3.5.1) that RRI proposals come in with detailed studies and alternatives; development of those studies and alternatives, including network alternatives, should be part of the CAISO ERA study process. To the extent that such studies and alternatives are offered by others, CAISO need not “reinvent the wheel;” however, it must independently evaluate them to ensure that they are complete, meet CAISO study requirements, and include all viable alternatives, including Network Upgrades.

Second, the RRI financing mechanism is capped and may not support all viable RRI interconnections if the ISO does not look at solutions more broadly in every case.

Third, the RRI policy has not yet been approved, and FERC’s Declaratory Order on the subject is being challenged.

C. RRI facilities should be available to any remote resource.

As the FERC has no renewable energy mandate, the RRI policy should be applicable to any remote resource, defined by immobility of the fuel source or physical plant, not type of fuel.

² See “CAISO South Regional Transmission Plan for 2006, Part II: Findings and Recommendation on the Tehachapi Transmission Project,” December 29, 2006, at p. 8. (“The principal benefit of studying Interconnection Requests in clusters is that it allows the CAISO to better coordinate Interconnection Requests with its overall transmission planning process, and, as a result, achieves greater efficiency in the design of needed Network Upgrades.... By pursuing an integrated solution, the Clustering approach will result in substantial capital cost savings for Network Upgrades when compared to the probable outcome of any piecemeal solution associated with the traditional, sequential SIS approach.” (Footnote omitted.)

III. Proposed Language Changes

Note: Proposed additions are in underline; proposed deletions are in strikeout. This list is not necessarily exhaustive of the changes that should be made to fully achieve the objectives discussed above. CAISO should make additional changes it believes are needed for that purpose (e.g., to Sections 3.7.1 and 3.7.2, and to Section 4), to the extent that it agrees with our comments above, and we may wish to suggest additional changes as the tariff language develops.

A. Section 1 (Executive Summary)

First paragraph:

"The potential exists for the development of significant generation resources that are constrained as a result of their location in areas that are not readily accessible to the CAISO grid, or to portions of the grid with inadequate capabilities, and the general immobility of their fuel source (referred to hereinafter as "location constrained resources"). Many CAISO stakeholders have stated that the cost of transmission interconnection facilities constitutes a significant barrier to the development of location constrained resources that are located in remote locations. Most obviously, the production of electricity through wind, solar, biomass and other technologies is limited to certain geographical regions with very little nearby load but vast potential for energy supply.

CAISO can best identify the most cost-effective network upgrades that address multiple system needs by studying the interconnection of these resources areas in conjunction with transmission planning practices that account for overall CAISO reliability needs and economic opportunities. However, power plants in these remote regions ~~typically~~ may require long-distance, high-voltage transmission lines to interconnect to the high-voltage transmission grid, ~~so the~~. The costs of such interconnection facilities are considerably greater than the costs of traditional generator tie-lines that are used to connect generators that are located closer to the CAISO grid.

B. Section 3.2

~~"This proposal addresses the current problem faced by developers who must situate their location constrained generation resources in areas that are remote from the grid, or are proximate to weak portions of the grid. Transmission facilities that are necessary to connect these locationally constrained resources will be studied in the CAISO's transmission planning process in an effort to identify robust network solutions that may be available to address a variety of needs in the general area. Any non-network interconnection facilities that may be identified in this process would be eligible for the RRI financing mechanism.~~

~~To qualify for the treatment proposed herein, a line must connect to location-constrained resources including, but not limited to, the following types of resources—wind, solar, biomass, geothermal, photovoltaic, hydroelectric, fuel cells using renewable fuel, digester gas, municipal solid waste, landfill gas, ocean wave and ocean thermal tidal current, defined as any resource that cannot move its fuel or other essential facility components. Examples would include projects using wind, solar or geothermal energy as the fuel source, or a project utilizing a natural cavern or other land feature.~~

~~"RRI rate treatment will depend upon a RRIF's location in an Energy Resource Areas ("ERA") certified by an appropriate state agency or body. Feedback from stakeholders included discussion about the role of the California Renewable Energy Transmission Initiative ("CRETI") in fulfilling this function¹. This group membership includes the California Public Utilities Commission ("CPUC"), the California Energy Commission ("CEC"), the CAISO, Center for Energy Efficiency and Renewable Technology ("CEERT") and public utilities. In their mission statement their scope of work includes three phases:~~

~~—Phase 1— Identification and ranking of competitive renewable energy zones ("CREZ")~~

~~—Phase 2— Refinement of CREZ analysis or priority zones and development of statewide conceptual transmission plan~~

~~—Phase 3— Detailed Transmission Planning for CREZs identified to be developed~~

~~"Further coordination will need to take place between the CAISO and CRETl in a number of areas, including (1) the similarities and differences between a CREZ and an ERA, and (2) clearly defining respective roles in this process, particularly for Phase 2 and 3 where the transmission planning process takes place. The CAISO transmission planning process will need to include the development of the transmission projects that are to be located under the CAISO control and are incorporated into the TAC.~~

~~"One issue that has been raised by stakeholders is that the process and criteria for designating energy resource areas—and the ultimate designation of energy~~

resource areas — might not occur by the time the CAISO's tariff development process is complete.

~~"The stakeholders, particularly from the renewable industry, have advocated that areas where there are currently thousands of MW of newly proposed generation projects in the CAISO generation interconnection queue be specified as ERAs. They state that this demonstrates the development potential of a particular region as well as sufficient commercial interest for an RRIF. SCE, however, has advocated the use of the State agencies' designation of CREZs when those become available. The CAISO proposes the following:~~

~~1) Utilize the areas which currently have thousands of MW of new generation projects proposed and included in the CAISO generation interconnection queue as ERAs for the interim (provided such areas meet applicable criteria, e.g., remoteness, potential to develop location constrained resources that would be developed by multiple developers) until the State agencies designate the final ERAs;~~

~~2) Modify the LGIP provisions of the CAISO Tariff to allow for retroactive clustering study approach for generation projects in these areas;~~

~~3) Proceed with the transmission study process to identify RRIF transmission projects to connect location constrained generation in these areas.~~

~~4) When the State agencies and the stakeholders complete the designation of the final ERAs, the CAISO will cease using the interim ERAs and will then use the final ERAs on a prospective basis."~~

"A precondition for RRI rate treatment will be an RRIF's location in an Energy Resource Area ("ERA"). The CAISO will confer ERA status on groups of queued projects that are studied in clusters pursuant to the LGIP provisions of the CAISO tariff, as modified to enable retroactive clustering.

Clustered projects will be studied in the CAISO's annual transmission planning process in order to consider those interconnection requests, in conjunction with broader CAISO system economic opportunities and reliability needs, to identify and develop the most cost-effective overall transmission solutions. An RRI facility may be identified as part of this process if it is the most efficient solution, or part of the solution, for interconnecting the queued projects.

Proposals for ERAs may also be made by any stakeholder, including state agencies, during the Open Season of the annual transmission planning process, which lasts from January 1st to December 31st for the following year's evaluation (i.e., submittal of the projects from January 1st – December 31st, 2008 for the CAISO transmission planning process that occurs in 2009). Stakeholders proposing the study of ERAs based on criteria other than the generation interconnection queue must fully justify the commercial potential of the area, given the absence of queue positions. After obtaining comments from other stakeholders, the

CAISO will determine whether to confer ERA status on the proposed area. If conferred, the CAISO will study the area in the transmission planning process.

Proposals for evaluation of RRIFs may be submitted to the CAISO during the Open Season of the annual transmission planning process , along with supporting technical and other information. CAISO will determine whether such proposals and supporting information meet CAISO study standards, including full consideration of larger grid economic and reliability needs and other viable solutions, including Network Upgrades. If a proposal and supporting information does not meet CAISO standards, CAISO may either reject the proposal or accept the resource area for study as a non-queue-based ERA.

C. Section 3.5

"The CAISO is developing revisions to its transmission planning process in compliance with FERC's Order No. 890, which FERC has required be filed as an attachment to the CAISO Tariff by December 7, 2007. The proposed revisions will incorporate numerous opportunities for stakeholder input, including opportunities for the submission during an "open season" of proposals for RRIFs that would ERAs based on non-queue criteria to be studied during the planning process. Specific RRIFs may also be proposed during the open season process.

"3.5.1 Evaluation of ERAs and RRIFs in CAISO annual transmission plan

The planning process would involve a flexible and robust transmission plan to link RRIFs to the CAISO Controlled Grid as part of the integrated CAISO transmission plan. It would also provide for the evaluation of RRIFs proposed in the CAISO planning process with non-PTO's transmission proposals to access the same ERAs through the California Sub-Regional Planning Group ("CSPG"). The CAISO proposes the following process, consistent with its annual transmission planning process, to evaluate proposed RRIFs that are to be located under the CAISO's operational control:

"(a) The CAISO annual transmission planning process is a stakeholder process that includes the CAISO, PTOs and stakeholders. CAISO-designated ERAs, based on clusters of queued projects, will be included in the CAISO annual transmission Study Plan for detailed evaluation and development of interconnection options that consider economic factors and grid reliability needs. The CAISO will provide for the evaluation of these ERAs in the CAISO planning process with non-PTOs' transmission proposals to access the same ERAs through the California Sub-Regional Planning Group ("CSPG"). An RRIF may be identified as an efficient solution, or partial solution, in this process.

"(b) "Proposed ERAs based on non-queue criteria may be submitted to the CAISO during the Open Season of the annual transmission planning process, which lasts from January 1st to December 31st for the following year's evaluation (i.e., submittal of the projects from January 1st - December 31st, 2008 for the CAISO transmission planning process that occurs in 2009). The CAISO will provide for the evaluation of those ERA proposals that it determines merit consideration based on an ERA's documented commercial potential; evaluation will be subject to the stakeholder and sub-regional planning group processes.

"(c) Proposals for evaluation of any proposed RRIFs may be submitted to the CAISO during the Open Season of the annual transmission planning process, along with supporting technical and other information as listed below in Section 3.5.2. CAISO will determine whether such proposals and supporting information meet CAISO study standards, including full consideration of larger grid economic and reliability needs and other viable solutions, including Network Upgrades. If a

proposal and supporting information does not meet CAISO standards, CAISO may either reject the proposal or accept the resource area for study as a non-queue-based ERA pursuant to (b) above.

"3.5.42 Submittal/Application of proposed RRIFs

~~"The CAISO proposes the following project justification and technical data requirements (aka Project Justification and Technical Study) when for any proposed RRIFs that a PTO or other Project Proponent submits their proposed RRI transmission project to the CAISO for evaluation: For an RRIF proposal submitted by a PTO or other Project Proponent in the Open Season to be considered complete as described above, it should include the following project justification and technical information:~~

- a. ~~Provides detailed~~ Detailed information on how the proposal will meet in meeting Key Principles 3.1, 3.2, 3.3, 3.4 and perhaps 3.7 (see section 4.7 for further details on the proposed "pre-designation" mechanism);
- b. ~~Has detailed~~ Detailed transmission studies which include power flow, short circuit and transient stability analyses to demonstrate that the proposed project meets applicable CAISO/WECC/NERC Grid Planning Standards;
- c. Includes several transmission alternatives (the CAISO suggests having at least three);
- d. ~~Provides planning~~ Planning level cost estimates for the proposed transmission project as well as its alternatives;
- e. ~~Provides a~~ A conceptual network transmission plan for future connection of the proposed RRIF;
- f. ~~Provides an estimate for the~~ Estimated operating date;
- g. ~~Provides a~~ A conceptual plan for connecting potential generation projects in the area if this information is known.

~~"Upon receiving the Project Justification and Technical Study, the The CAISO will review the project justification and any supporting information to determine whether the proposed submittal meet the data requirements above. The CAISO will provide a letter response to the Project Proponent within 30 calendar days to notify whether or not the project submittal meets the above data requirements and, if not, whether the proposal has been accepted for study as a non-queue-based ERA. The CAISO will include the proposed project in the CAISO Transmission Plan in its following year's transmission planning process (please see "Open Season" discussion in Section 4.5.2 below).~~

"3.5.2 Open Season

~~"The Any proposed non-queue-based ERA or RRIF transmission project proposals must be submitted to the CAISO during the Open Season of the annual transmission planning process, which lasts from January 1st to December 31st for the following year's evaluation (i.e., submittal of the projects from January 1st – December 31st, 2008 for the CAISO transmission planning process that occurs in 2009).~~

" 3.5.3 Evaluation of Proposed RRIF Transmission Project(s)

~~"If a proposed RRIF transmission project meets the data adequacy requirements as outlined in Section 3.5.1, the CAISO will include the proposed project in its annual transmission planning process in the following year. The proposed transmission project will be included in the Study Plan of the CAISO annual transmission plan for further detailed evaluation and approval. The CAISO annual transmission planning process is a stakeholder process that includes the CAISO, PTOs and stakeholders. This process will be described in greater detail in the CAISO's Order No. 890 compliance filing.~~

"In evaluating the proposed RRIF transmission project(s), the CAISO will consider the following key elements:

- a. Compliance with Meeting Key Principles 3.1, 3.2, 3.3 and 3.4 (these principles are pre-requisite as outlined in Section 3.5.1~~2~~);
- b. Compliance with Meeting or surpassing applicable CAISO/WECC/NERC Grid Planning Standards;
- c. Having a flexible and robust transmission plan for RRIFs (i.e., the proposed transmission plan is robust that it can be expanded to network facilities in the future, yet flexible to accommodate the initial proposed location-constrained generation interconnections);
- d. Having a "least cost" solution based on per MW line capacity basis (i.e., the proposed transmission project may have higher total cost but may be able to connect more generation plants; therefore, its cost per MW basis may be the lowest of all considered alternatives);
- e. Providing additional reliability and/or economic benefits for the grid; these are added benefits for consideration and are not requirements for an RRIF; however, to the extent that the solution is not strictly least-cost under (d) above, these benefits may be cited in support of claims that the project is nonetheless cost-effective or otherwise optimal.

" 3.5.4 Competing Projects from a Non-PTO

~~"In the event that~~ If a competing project is proposed by a non-PTO, the CAISO proposes that the evaluation of similarly situated transmission projects be evaluated by the proposed California Sub-Regional Planning Group ("CSPG"). The CSPG is a newly proposed sub-regional planning group to address seams issues for transmission owners and stakeholders in California and neighboring utilities. More detailed discussion on the CSPG will be provided in the CAISO's Order 890 compliance filing."

D. Section 3.7

"As an additional safeguard to ensure the viability of RRIF projects and to mitigate the risk of stranded costs, a demonstration of commercial interested will be required for this alternative cost treatment. The CAISO proposed a two-pronged test: (a) the CAISO will require that 25% of the capacity of the new RRIF

be "subscribed" pursuant to executed Large Generator or Small Generator Interconnection Agreement ("LGIA" or "SGIA") prior to commencement of construction of the RRIF; and (b) there must be a showing of additional interest in the project representing 35% of the capacity above and beyond the percentage LGIA/SGIA capacity required in (a). Both prongs of this test must be satisfied before construction of an RRI transmission facility commences.

~~"A suggestion has also been made that the CAISO consider implementing some sort of predesignation mechanism whereby a specific proposed RRIF to a particular ERA could be "predesignated" early in the development process by indicating its eligibility for the financing treatment proposed herein before having to clear the commercial interest hurdles. The CAISO seeks parties' comments on this and, in particular, how any pre-designation process would work, what the criteria should be and the amount of time provided to complete the "contingent" RRIF request.~~

~~"To address this concern, the CAISO is proposing that it would accept initial applications for RRI financing that met all of the defined criteria except of the demonstration of commercial interest. Upon a CAISO finding that a proposed project met all of the RRI criteria other than the commercial interest requirement, the CAISO would issue a contingent approval of the project that the developer could use to complete the commercial interest showing. Upon meeting the commercial interest showing, the CAISO would then grant final approval of RRI financing for the project."~~