



Stakeholder Comments Template

Generator Interconnection: Cluster 14 Revised Study Process and Timeline

This template has been created for submission of stakeholder comments on the Supercluster Interconnection Procedures issue paper and draft final proposal that was published on May 14, 2021. The proposal, stakeholder meeting presentation, and other information related to this initiative may be found on the miscellaneous stakeholder meetings webpage at:

<http://www.caiso.com/informed/Pages/MeetingsEvents/MiscellaneousStakeholderMeetings/Default.aspx>

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **May 28, 2021**.

Submitted by	Organization	Date Submitted
<i>Cameron Yourkowski 503-432-0982</i>	<i>EDP Renewables North America LLC (“EDPR”)</i>	<i>May 28, 2021</i>

Please provide your organization’s comments on the Supercluster Interconnection Procedures issue paper and draft final proposal, and May 21 stakeholder call discussion:

EDPR appreciates the opportunity to comment on the CAISO’s “Supercluster Interconnection Procedures issue paper and draft final proposal” and appreciates the ISO’s efforts to propose a balanced approach to managing a difficult situation.

After considering the ISO’s initial proposal and struggling to resolve the many competing goals and interests involved, EDPR’s position is that the primary near term goal of any C14 process changes should be to produce meaningful and financeable Phase I results for as many customers as possible, as soon as possible, without putting undue cost risk on either the transmission customer or the transmission owner. EDPR is concerned that the current proposal is not the best option for getting as close to that goal as possible. EDPR supports taking more time on the front end to identify alternative proposals.

EDPR appreciates the proposal’s focus on transparency, consistency, and avoiding an ad-hoc and uncertain process going forward. EDPR agrees that adopting changes that have a high confidence of ultimately being achieved is very important.

EDPR’s primary concerns with the ISO’s draft proposal are:

- 1) Phase I study results are significantly delayed for all customers.

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- 2) Phase I study results are incomplete for all customers.
- 3) Phase I study results do not provide a reasonable cost-cap to customers that—consistent with the status-quo—would otherwise facilitate commercial negotiations.
- 4) Phase I at-risk deposits do not impose the same amount of discipline on the customers' decision to move forward and could have unintended consequences, ultimately exacerbating the C14 management issues for the ISO and PTOs into Phase II.

Given the urgency to support as many generating resources coming on-line in 2023 and 2024, EDPR asks the ISO to consider an approach that would salvage as much of the status-quo timing, terms and conditions for those C14 requests that can demonstrate a path to coming on-line within this time period—if they are given meaningful, financeable, and timely Phase I results.

In considering this request, EDPR notes that a subset of C14 requests include storage additions to existing projects that have already surpassed many of the standard commercial hurdles. Examples of criteria for “fast racking” such projects might include 100% site-control and staying within existing interconnection facility ratings.

If such projects can be given meaningful Phase I study results with some degree of capped cost exposure in Q1 of 2022, they would still have the ability to finalize commercial negotiations and come on-line in 2024. EDPR recognizes the complicated mechanics of bifurcating the cluster in such a way. However, we believe the procurement and policy imperatives warrant consideration of this approach and we are flexible on the exact details for accomplishing this goal.

At a high-level, one approach to providing more meaningful Phase I information to a subset of C14 customers would be to provide a range of results consistent with the “reasonable study scenarios and dispatch assumptions” the ISO proposes for the steady state analysis. Within these reasonable scenarios, the ISO could provide customers with their best- and worst-case cost exposures as determined by how many customers ultimately move forward, the range of upgrades triggered and the number of customers sharing in the costs of those upgrades. These customers would be provided a range of binding cost caps, with the final cost-cap ultimately being determined by the results of Phase II. The current at-risk financial security amounts, terms and conditions would be maintained for these customers. EDPR would also support additional deposits to support any incremental study work associated with this approach.

A more extreme approach to managing C14 would be to only move forward with those requests that can meet more stringent requirements. If the above “bi-furcated approach” is too unwieldy to implement, EDPR would also consider supporting more extreme measures to manage the number of requests that can be meaningfully processed in a reasonable amount of time (subject to review).

Lastly, EDPR offers a little caution regarding the framing of C14 as a “supercluster.” Looking backward, Cluster 14 certainly represents a record and even an “extreme” number of requests, but it is not clear yet that it should be viewed as a complete outlier going forward. Looking at the broader context of the magnitude of new interconnections that ultimately will be needed to meet California’s clean energy goals and replace aging

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infrastructure, Cluster 14 can also be viewed as a sign of things to come. This is not to say that such drastic spikes in the number and megawatts of interconnection requests is optimal. To the contrary, EDPR supports a more long-term focused, steady, and rationalized approach to procurement, system planning, and interconnection. As the ISO already knows, attaining these goals will take collaboration between the ISO, the PUC, the PTOs, transmission customers and other agencies and stakeholders. EDPR recognizes the efforts to date to move in this direction but until such time that these processes are more rationalized and coordinated around a long-term vision, the ISO and PTOs should also be thinking about how to handle a larger number of requests in a timely manner and while producing meaningful and financeable results.

EDPR is not opposed to the ISO proactively putting provisions in place to better manage clusters that overwhelm the queue processing resources available at the time. However, we are concerned that putting a specific number in place (150) does not reflect the need to simultaneously increase queue processing capability and does not recognize the rapidly evolving nature of the grid, generator and storage technologies, and the ever-changing policy environment.