

**COMMENTS OF FIRST SOLAR  
ON THE CAISO DRAFT FINAL PROPOSAL  
FOR GENERATOR INTERCONNECTION PROCESS REFORM**

First Solar appreciates the considerable progress toward generator interconnection process reform that the Draft Final Proposal Represents. In general, we support the proposal.

The Large-Scale Solar Association has submitted comments on the proposal on behalf of its members, including First Solar. We offer some additional comments, below.

4.2.1, Table 2, Line 5: The intent of “PTO needs time to consider ISO proposed changes” is unclear. We suggest changing it to “PTO reviews ISO proposed changes.”

4.2.1, Table 2, Line 23.1: The information in this line conflicts with Section 4.2.4, which we understand is the intended provision.

Deliverability Proposal

We support the proposals to offer Energy Only projects the opportunity to gain Full Capacity Deliverability Status, but propose the following enhancements.

*One-Time – Enter Cluster 4*

CAISO’s Draft Final Proposal includes a one-time opportunity for Interconnection Customers to use the Generation Interconnection Procedures (GIP) to modify an existing generation facility or prior queued interconnection request from Energy Only to Full Capacity Deliverability Status. The proposal would offer this opportunity one time only in conjunction with Cluster 4.

We propose that CAISO also allow Interconnection Customers to use interconnection studies from other active interconnection requests in earlier clusters for this purpose, if the interconnection points are the same and the Phase 2 study for the later queued project has not yet commenced. This would get more Full Capacity generation on line sooner without disadvantaging other projects in the interconnection queue.

Consider the example of an Interconnection Customer (IC) with two active interconnection requests at the same interconnection point, 100 MW Energy Only in the Transition Cluster and 200 MW Full Capacity in Cluster 1. Our proposal is to give the IC an option to convert the Cluster 1 study from 200 new MW to 100 new MW and use the other 100 MW for the one-time deliverability assessment for the Transition Cluster project. The study results of other queued projects would not be adversely affected because, for the purposes of the deliverability assessment, the location and size of the Full Capacity project in the Cluster 1 would remain unchanged, and the reliability assessment would have 100 fewer MW. With part of the study work already having been performed, and with the necessary deposits and financial security already posted, it would serve no useful purpose to force the IC to postpone the deliverability assessment for the EO project until Cluster 4.

*Annual – Available Transmission*

Section 4.4.2, Item 5) states, “For generation assessed through item (2) that were denied Full Capacity, conceptual transmission congestion mitigation plans would be identified and considered in the ISO comprehensive transmission planning process.” The tariff modifications need to include a provision that, if the necessary mitigation plans are approved through the transmission planning process, then the generation will receive Full Capacity Deliverability Status.

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