California ISO

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

The CAISO plays a critically important role in collaboration with other agencies in the overall plan for our state and nation to achieve clean energy and climate targets. If any element of this overarching and interlinked plan is delayed, the overall goal is delayed.

Our concern is that the CAISO is focusing on the queue/cluster management challenge as a business as usual, process oriented problem without sufficient attention to the big picture. We are in a climate crisis, its severity demands we all act with a sense of urgency.

Rather than push out the study process timeline and consider queue reform at some time in the future, queue reform should be implemented now even if it means seeking waivers and abandonment of elements of the collaborative stakeholder process.

Instead of pushing out process timeline to accommodate the higher number of applications, the number of applications studied should be reduced to meet the original schedule:

- CAISO should determine how many projects it can study within the original timelines given available resources,
- develop a project viability ranking based on statistical analysis of project failure/withdrawal rates of original applications in previous clusters,
- bifurcate the “supercluster” with the highest ranking projects moving forward according to the original timeline and the rest on a separate study track on a delayed timeline.