

Comments of The Large-scale Solar Association on Annual Policy Initiatives Roadmap Process Straw Proposal

The Large-scale Solar Association (LSA) hereby submits these comments on the July 18th document, Straw Proposal - Annual Policy Initiatives Roadmap Process (Proposal), and the July 25th stakeholder conference call to discuss the Proposal.

LSA supports the CAISO's objective to tie the stakeholder initiatives process more closely to the CAISO's short-term and long-term strategic planning. LSA does not see tremendous benefits to the twice-early updating of the Stakeholder Initiatives Catalog (SIC) or the "continuous" stakeholder ability to submit new initiatives but sees no harm in that part of the proposal if it is properly managed, as explained further below.

LSA's concerns with the Proposal relate more to the elements that are left out, as we stated on the call. These concerns include the following:

Criteria the CAISO will use to assess submitted suggestions. LSA agrees that the earlier scoring mechanism was cumbersome and had limited usefulness. However, the Proposal does not explain what mechanism the CAISO will use in its place, other than the general objective of alignment with CAISO strategic-planning objectives – e.g., how the CAISO will consider other factors such as importance to objectives other than its own.

Timelines for submitting initiative suggestions. If the CAISO plans to issue twice-yearly updates to the Catalog and Roadmap(s), there must be some timeline after which initiatives would be considered for inclusion after issuance of the next update, e.g., one month before the next update is due.

Stakeholder input. The Proposal is silent on if and how stakeholder comments would be submitted and considered in the process. Assuming that comment opportunities would still be part of the process, it would be extremely cumbersome if stakeholders must check continually to see when new initiatives are submitted in order not to miss the comment deadlines for each. It would make more sense if either:

- The CAISO notices receipt of suggestions as they come in, along with associated comment deadlines; or
- The CAISO sets the comment deadlines for all new suggested initiatives at some common date, e.g., 2 weeks after the submission deadline for the next update (see above).

LSA looks forward to seeing these concerns addressed in the next version of the Proposal.