



## 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](mailto: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:**

Leeward Renewable Energy, LLC (“Leeward”) appreciates the opportunity to comment on the CAISO’s proposed Supercluster Interconnection Procedures (the Proposed Procedures).

As background, on April 1, 2021, Leeward announced the successful closing of its acquisition of substantially all of First Solar’s U.S. solar development platform, and most of the former First Solar development team is now part of Leeward. Leeward is a U.S.-based independent energy producer that, through its subsidiaries, owns and operates a portfolio of over 2,000 MW of renewable energy projects located across nine states. The company is currently developing another 17,000 MW of renewable energy projects, including several projects in the CAISO queue that would be significantly impacted by this proposal. These projects are critical to the achievement of California’s Clean Energy goals, and stand in addition to the approximately 4,000 MW of solar projects developed by the First Solar development team that currently provide power to customers in California.

Leeward appreciates the need to manage the study process and timeline to address the large influx of projects from QC14 given resource constraints at CAISO and the PTOs, and we are supportive of the revisions proposed in the Proposed Procedures that are necessary to address urgent and immediate timing and process concerns. Specifically, we support CAISO’s proposal to file with FERC this summer to

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extend current interconnection study deadlines to accommodate the QC14 supercluster, and to modify how the Phase I interconnection studies are conducted for that cluster. With respect to other actions under consideration, we urge CAISO to take a more measured approach that allows adequate time to thoroughly consider impacts of the currently-proposed solutions and that allows for a more systematic stakeholder process. To that end, we request that CAISO address on an emergency basis only those changes that are time-sensitive and necessary for CAISO to move forward with and expedite the Phase I study process immediately.

There is time to address the remaining non-urgent issues identified in CAISO's Proposed Procedures through the upcoming Interconnection Process Enhancements initiative. Issues that do not seem to have immediate time pressure to be resolved include the cost cap and interconnection financial security reform (postings for Phase I would not be due until January 2023 under the CAISO's proposed timeline); whether to hold an open window in 2022; the process for managing future superclusters; and how to release study results on a PTO-by-PTO basis to help confine and mitigate overall impacts.

We believe approaching the solutions through the IPE process rather than in the emergency filing will allow the rules to be developed to facilitate the level of interconnection of new renewable and storage resources that will be necessary to meet California's policy goals. It will also allow more time to engage with stakeholders on the solutions and to think more holistically about reforms.

Leeward sees the upcoming Interconnection Process Enhancements initiative as a critically important opportunity to examine additional potential reforms that could lead to more manageable queues moving forward, support the development of resources needed to help address reliability and supply, and meet California's GHG reduction and policy goals. This should include providing a fast track for commercially viable projects that already have Phase I and II studies in hand to proceed to commercial operation and clear out of the queue, including a mechanism for advanced energy-only projects to compete for deliverability on a level playing field. It should also include addressing financial security reform, including posting caps to address the supercluster and penalty-free withdrawal provisions like those adopted in other ISOs and RTOs for all projects, not just those affected by the supercluster.

We look forward to working with CAISO on the upcoming IPE initiative and appreciate the opportunity to offer these comments on the Proposed Procedures.