

Supercluster Interconnection Procedures

Submitted by	Organization	Date Submitted
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PG&E appreciates the opportunity to engage the CAISO and provide comments on the topics discussed in the May 21st stakeholder meeting for the newly launched Supercluster Interconnection Procedures initiative. PG&E would like to recognize the CAISO for having the foresight to take procedural steps to accommodate this queue “supercluster” and ensure more meaningful study results. PG&E would like to express general support for the three principal revisions to the CAISO’s queue cluster interconnection process for Custer 14 and future queues with 150 interconnection requests or more. PG&E would like the CAISO to address and consider how it might revise the proposed schedule in the event of a significant number of projects dropping out of the queue following Phase 1.

PG&E, like the CAISO, believes that transparency and consistency are important principles when revising the cluster interconnection procedures. To that end, PG&E requests that the CAISO openly share modelling assumptions and guidelines so that both Load-Serving Entities (LSE) and the project developer community have an equal understanding of the risks of curtailment and clearly convey any differences between the interconnection customer requested Commercial Operation Date (COD) and the earliest achievable COD based on the upgrades identified. Also, PG&E requests the CAISO consider the pros and cons of publishing study results for all PTOs at the same time. One benefit of doing so, is that it would enable a level playing field for all project developers looking to respond to LSE RFOs.