



EDF Renewables North America
15445 Innovation Drive
San Diego, CA 92128
www.edf-re.com

May 11, 2022

Chair Ashutosh Bhagwat
Vice-Chair Mary Leslie
Governor Severin Borenstein
Governor Angelina Galiteva
Governor Jan Schori

California Independent System Operator
250 Outcropping Way
Folsom, California

RE : Public Comment Letter from EDF-Renewables on Interconnection Process Enhancements Phase 1

Dear Chairman Bhagwat and Governors,

EDF-R supports the CAISO's Interconnection Process Enhancements (IPE) Phase 1 proposal. In response to stakeholder input this proposal was substantially reshaped during the course of the policy development process in a positive direction. That reshaping is a testament to the CAISO's Transmission Planning & Infrastructure Development staff's responsiveness and commitment to robust policy outcomes. With these comments EDF-R would like to take the opportunity to highlight two IPE items.

PPA Offtaker Clarifications

In its December 2021 Straw Proposal CAISO staff proposed to revise the tariff to clarify that a PPA must be with an offtaker to fulfill the offtaker's own RA obligation in order to receive a Transmission Planning Deliverability (TPD) allocation. In response to this, EDF-R and other stakeholders expressed concern that this requirement would eliminate development arrangements where a generator's Resource Adequacy (RA) product was contracted to a third party before being contracted to a Load Serving Entity (LSE) to serve the LSE's RA obligations. This topic was discussed in public comments, public meetings, and 1-on-1 meetings with the CAISO over 4 months. In response to those conversations, the CAISO shifted the final proposal to allow projects to receive a TPD allocation when attributes of the project are under contract with an entity with a RA obligation to be eligible for a TPD allocation, even if that arrangement is via a third party. EDF-R is grateful for this change. This approach allows for needed flexibility and supports diverse development arrangements.

TPD Allocations for Projects Without a PPA or That Are Not on a Shortlist

In its December 2021 Straw Proposal CAISO staff also proposed to revise the tariff to simplify the Transmission Planning Deliverability allocation process (TPD) and remove the ability for projects without a PPA or that are not on a shortlist to receive a TPD allocation. EDF-R and other stakeholder strongly opposed this change. This change would have upset and further complicated RA solicitation as TPD allocation is critical element demonstrating project viability during solicitation processes. In the final proposal CAISO staff introduced a new Allocation Group D that allows for projects without a PPA or that are not on a shortlist to



EDF Renewables North America
15445 Innovation Drive
San Diego, CA 92128
www.edf-re.com

receive an allocation. While there are still elements of this proposal EDF-R does not agree with, the Group D final proposal is on the whole a clever solution that cleaves nicely into the CAISO's existing TPD process, and EDF-R appreciates CAISO staff's collaboration on policy.

EDF-R looks forward to further collaboration with the CAISO in Phase 2 of the IPE initiative where the CAISO will consider major interconnection process changes that are very much needed at this critical inflection point for generation and transmission development. EDF-R is grateful that the CAISO has started a sub-process within this IPE initiative to consider improvements to generator interconnection and transmission data transparency. Improved data access in these efforts will be critical when the CAISO and stakeholders consider the IPE Phase 2 proposals.

/s/ Arash Ghodsian

Sr. Director Transmission and Policy
arash.ghodsian@edf-re.com