



September 4, 2018

California ISO Board of Governors

Re: First Solar Support for Interconnection Process Enhancements Proposal

Dear Governors:

First Solar supports the Interconnection Process Enhancements Track 2 proposal (agenda item No. 8). Managing the vast number of projects and megawatts in the interconnection queue while maintaining a reliable grid comprised of an increasingly complex resource mix is a challenging job. First Solar appreciates that the California ISO balances many factors when it considers reforms to its interconnection rules: state policy goals, grid reliability, ratepayer impacts, commercial and financial consequences for project developers, as well as burden and expense for the participating transmission owners, to name just a few.

With new state policies pushing the electric sector to further reduce greenhouse gas emissions and add renewables to the grid, these challenges will continue to evolve as the procurement landscape also shifts in the state. First Solar encourages the California ISO to continue to consider reforms that give renewable developers flexibility to respond to the evolving requirements of load serving entities and commercial end users. One example is allowing interconnection projects to add storage throughout the development process as demand, cost structures and technology continue to advance. Targeted solutions that address issues without wholesale limitations will allow renewable developers at all stages of development to adapt to shifting needs and respond to new customer requirements.

First Solar appreciates the significant effort of the California ISO staff and management to reform the generator interconnection process. We remain committed to engaging with the California ISO team as you respond to new state policies and balance competing interests to maintain a healthy grid.

Sincerely,

A handwritten signature in blue ink that reads "Kathryn Arbeit".

Kathryn Arbeit
Vice President, Project Development, the Americas