

August 2, 2011

To: CAISO

Fr: Daniel Kim, Westlands Solar Park

Re: Generation Interconnection Procedures - Potential Revision to Cluster 4 Study Methodology

On behalf of the Westlands Solar Park, I am providing the following comments to the July 29<sup>th</sup> stakeholder conference call on potential revisions to cluster 4 study methodology.

The Westlands Solar Park thanks the CAISO for putting together this draft discussion paper for potential revisions to cluster 4 study methodology out of concern that the unprecedented volume of generation requests received in Cluster 4 will result in unrealistic results if the current methodology is applied. We also agree that the 33,000 MW in Cluster 4 and the 3,000 MW in Cluster 3 imposes severe challenges to transmission planning and the current methodology that accommodates all generation that has submitted an interconnection request within the queue can result in a transmission plan that is unrealistic.

Regarding the proposed draft discussion paper we have the following comments that we would like the CAISO to consider.

1. We believe that this proposed revision to the Cluster 4 study methodology needs to be expanded beyond just including Cluster 3 projects. We would like the CAISO to consider reviewing all the interconnection requests for all 4 Clusters and energy-only deliveries and reassign where Category 1 and Category 2 transmission lines should go based on more current information on where renewable development is occurring. We understand that this request may be outside the scope of this draft discussion paper and is more in line with the TPP-GIP integration workshop.
2. We agree that it is more efficient to use the Cluster 3 network upgrades and cost and carry it forward to the cost allocation stage only if the generation assumptions in the CPUC portfolios are correct. For example: in the Central Valley, the CPUC portfolios only identify 800 MW of generation potential from the Westland Solar Park but in the CAISO interconnect applications for Cluster 3 and 4 the amount is in excess of 10,000 MW in the Central Valley. We believe that the disconnect from the CPUC portfolio assumptions and the CAISO queue needs to be looked at more closely before determining network upgrade and costs. Furthermore, we agree with the draft discussion paper that under the current system a quarter of ISO's market load cannot be supplied from a single area but we disagree that this cannot be the case over the next 20 years, especially when you consider the potential growth of storage and smart grid technology to balance intermittent generation and the possibility of establishing seasonal exchanges between BAAs that has the potential to free up grid capacity throughout the system.