



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. Submissions are requested by close of business on **May 28, 2021**.

Submitted by	Organization	Date Submitted
<i>Kallie Wells</i>	<i>Gridwell Consulting on behalf of esVolta</i>	<i>May 28, 2021</i>

Please provide your organization’s comments on the Supercluster Interconnection Procedures issue paper and draft final proposal, and May 21 stakeholder call discussion:

As a matter of introduction, esVolta is involved in the development, design, construction, financing, and management of advanced energy storage projects in California.

esVolta appreciates this opportunity to provide comments on the CAISO’s proposed changes to accommodate Supercluster 14. In the draft final proposal, the CAISO proposed to hold all participating transmission owner (PTO) study results until every PTO is ready “to ensure a level playing field.” esVolta believes this does not achieve the desired effect. Rather, this proposal puts all CAISO Cluster 14 projects at a competitive disadvantage by prohibiting them from being competitive with Cluster 14 WDATs. PTOs are not currently proposing to extend the study timelines commensurate with the CAISO’s delay (nor should they). Cluster 14 WDAT projects will be better positioned to compete for RA because they have their Phase I results, where all CAISO Cluster 14 projects will not.

esVolta requests the CAISO make modifications to the proposal such that interconnection requests submitted prior to QC14 are not affected by QC14 proposed timelines. This will be especially impactful for projects being studied through the independent study process (ISP) that were submitted prior to, but whose transmission plan deliverability is being

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studying during, Cluster 14. The intent of the ISP process is to accommodate projects with a need for accelerated COD. By delaying the deliverability results for these ISP projects, the CAISO would be changing the ISP process mid-study and harms projects with executed PPAs that were counting on QC14 deliverability timelines assumed prior to the announcement of the Supercluster. A look at SCE and CAISO's queue indicates that 8 WDAT ISPs and 3 CAISO ISPs totaling ~1300 MW will have to wait for their deliverability results (placing existing and executed RA contracts in jeopardy).

esVolta encourages the CAISO to reconsider the portion of its proposal that creates an artificial delay created for the sake of uniformity, but that has the effect of unnecessarily disadvantaging some. esVolta respectfully requests the CAISO adopt a publish-as-available timeline for all PTO study areas for all parts of the study process, including deliverability allocation.

Lastly, esVolta recommends a separate CAISO discussion track be formed to consider the implications of proposed Supercluster details on already-contracted interconnection requests.