

**Comments of the California Wind Energy Association on
the CAISO Revised Proposal on Queue Cluster 4 Phase 1 Study Methodology**

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The California Wind Energy Association (CalWEA) appreciates the opportunity to submit these comments on the California Independent Transmission System Operator (CAISO) revised proposed revisions to the methodology to perform Phase 1 Interconnection Studies for interconnection requests in Queue Cluster 4 (QC-4).

CalWEA supported the CAISO originally proposed special methodology for performing Phase 1 technical study of QC-4 projects and continues to support that methodology after the CAISO proposed changes to that methodology as presented in its draft technical bulletin of 9/19/2011 on this matter. In addition, we would like to ask the CAISO to pay attention to CalWEA's proposal on "meet the readiness milestones or park" criteria (as we have proposed in response to Question 4a of the CAISO revised straw proposal on TPP-GIP integration) as a way of responsibly and systematically screening out projects in QC-4 based on their readiness before allowing them to enter into Phase II studies.

Based on our proposal, the CAISO would consider establishing readiness milestones, in addition to Phase 1 IFS deposit, for projects to enter into Phase 2 studies. The CAISO should then allow projects that cannot meet the readiness milestones to "park" for one cycle until the next cluster cycle. Based on our "meet the readiness milestones or park" proposal, the CAISO should require a project to meet two out of the following readiness milestones before the project is allowed to enter Phase II studies:

1. Demonstrate environmental permit for the project;
2. Demonstrate final site control for the project;
3. Demonstrate proof of project financing;
4. Demonstrate proof of access right to the POI substation;
5. Demonstrate equipment purchase order;
6. Have one year of recorded local meteorological data based on local measurement;
7. Have an approved PPA; and
8. Make an additional 50% deposit above its Phase 1 IFS deposit requirement.

Projects not meeting the two readiness milestones would then be "parked" for one year and studied in the next year's study process if they can then meet the required milestones – otherwise, they would have to leave the queue. A project that is parked would also postpone its Initial IFS posting requirement by one year and its unused study deposit will be used for its study in the next year's cluster cycle.

We believe that the application of the readiness screen proposed here to the projects in Queue Cluster 4 (QC-4) will make the size of project that enter into Phase 2 studies to be more reasonable. It will also allow projects that will be parked to have one more chance to show their readiness before they are forced to leave the CAISO interconnection queue.