



Comments from First Solar

Submitted via: regionaltransmission@caiso.com

RE: Generation Interconnection Procedures: Deliverability Requirements for Clusters 1 and 2

First Solar submits these comments in response to the CAISO's request for stakeholder input on its **Generation Interconnection Procedures: Deliverability Requirements for Clusters 1 and 2– Revised Discussion Paper** of January 10, 2012 and its January 19th stakeholder meeting.

First Solar strongly supports the ISO's proposal to revise the Deliverability requirements for Clusters 1 and 2, as described in the discussion paper. We also support extending the new Deliverability study approach for Clusters 1 and 2 to Clusters 3 and 4. In addition, we have some comments to improve a couple of details in the proposal.

- **Posting of Interconnection Financial Security**

The paper states that the ISO will issue a supplement to each Cluster 1 and 2 interconnection customer's Phase II Interconnection Study Report. However, issuance of the supplemental reports will not result in a change in the date for interconnection customers to make the second posting of interconnection financial security.

If the supplements to the Cluster 1 and 2 Phase II reports and associated notices of the amounts of the first postings of Interconnection Financial Security are delayed appreciably past February 1, 2012, then the required dates for those postings also should be delayed. Interconnection Customers should receive at least 3 weeks' notice of the required posting amount to allow for corporate approvals and financial arrangements.

- **Cluster 3 & 4 Study Approach**

The paper describes a Deliverability study methodology for Clusters 3 and 4 that would apply the full amount of Cluster 3 and 4 generation initially to determine the transmission required to interconnect all projects in these clusters at their requested deliverability status. Then the methodology would use the same criteria as for Clusters 1 and 2 to identify the Delivery Network Upgrades (DNUs) that can be dropped from the initial Cluster 3 and 4 Phase II results. Rather than that approach, we suggest that studying an amount of new generation in each area consistent with TPP resource scenario assumptions plus a reasonable margin would more accurately assess the need for DNUs than studying the full amount of generation in Clusters 3 and 4. This approach also will yield needed results regarding reliability NU and plan of service for Cluster 3 and 4 projects if the cluster generation in each area is



divided into a couple of groups, and separate scenario studies are run for each group, so that the generators in each group can be modeled at full output.

Thank you for the opportunity to submit comments.

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