



**Westlands Solar Park Comment
On January 25, 2023
Transmission Development Forum**

The Westlands Solar Park appreciates the opportunity to provide this comment on the most recent quarterly transmission development forum. Our comment focuses on PG&E's presentation given our projects in Queue Cluster 8, 9, and 14 are all interconnecting to PG&E-owned high voltage transmission facilities in the Central Valley. Our Cluster 8 projects have CODs in Q3 of this year, and our Cluster 9 projects have CODs in Q1 of 2024. Therefore, we have several projects within a year of reaching commercial operation, and our comment reflects the fact that we have fast-approaching milestones that depend on PG&E to timely construct network upgrades necessary for our interconnection and closely coordinate any timeline change with our team.

Since the beginning of these quarterly forums, PG&E's generator interconnection project team that we interact with has deferred to these forums for updates and insights into network upgrades our interconnecting resources are dependent on, claiming they lack awareness of network upgrade development and are only focused on generator interconnection. However, transmission development forums occur infrequently and lack sufficient detail to answer some questions. Transmission development has a clear impact on generator interconnection, so project teams must be more aware of transmission development.

In particular, the project team has said they cannot notify us of delays to the in-service date for RNUs we depend on (if such delay occurs) and that we must monitor these quarterly forums. For projects nearing commercial operation, project teams must be aware of transmission delays in real-time so they can provide notice to interconnection customers and manage timelines accordingly. Interconnection customers incur real costs when there are late-stage upgrade delays and must act quickly to limit these costs and manage new timelines with contractors. Combing quarterly updates to spreadsheets cannot be the only way that interconnection customers receive notice of delay, especially when it comes to upgrades that are required for interconnection and that impact project milestones. Although CAISO hosts forums to discuss updates to the spreadsheets, these forums are curiously not recorded and thus interconnection customers cannot be assured access to any information outside of what is provided in the spreadsheets or in written responses to comments provided months after the forum. This lack of access is problematic, especially when interconnection customers cannot have informed discussions with their PTO's interconnection project team.

When there is a delay that prevents any GIA milestone from being reached, PTOs are obligated under CAISO's BPM for Generator Management Section 6.2.1.3 to notify CAISO and interconnection customers of the delay regardless of network upgrade type. This notice is required to include a description of the proposed changes, the impact on interconnection customers and generating facilities, and a description of potential alternatives considered. PTO-driven delay is also a meaningful distinction when it comes to the commercial viability criteria. It is not clear to us how this process is supposed to work given that we have not received these types of notices or any details prescribed by CAISO's BPM such as the potential alternatives considered.

In addition to the need for some mechanism to allow for more frequent and detailed information about transmission delays to provide interconnection project teams up-to-date information, the information provided in the quarterly forums needs to be more specific. PG&E estimates in-service dates by quarter, but our projects have much more specific milestones. Quarterly estimates do not provide sufficient assurance that our projects are still on track. This is especially true when interconnection project teams are not sufficiently aware of network upgrade development, and it creates uncertainty about the milestones in our GIA or as approved in modification requests agreed to by PG&E (and CAISO). We believe that quarterly estimates are reasonable for in-service dates several years out, but for estimates of the next year and sooner, the quarterly estimates provided in the transmission development forum can still create uncertainty for interconnection customers.

We appreciate the intent of these forums to aggregate and broadly publicize transmission development information, but these forums only provide generally high-level information, are not recorded for re-visiting the information that is shared, and occur too infrequently to provide timely information to projects under active construction, particularly for upgrades that are needed to energize projects. We request that CAISO work with the PTOs to determine how more real-time transmission status information can be shared with interconnection customers. We suggest that at the very least CAISO sponsor some means by which PTOs must report transmission delays that impact GIA milestones and require timely notice to the interconnection customer.

Thank you for your consideration of these comments.

Daniel Kim

VP - Regulatory and Governmental Affairs

Westlands Solar Park

Phone: (916) 709-9289

Email: dan@westlandssolarpark.com

Dated February 8, 2023