



March 20, 2025

Via Email: Isabella Manhein (imahein@caiso.com), Stacey Bernard (sbernard@caiso.com), and Kristina Osborne (kosborne@caiso.com)

Mr. Severin Borenstein
Chair
California ISO Board of Governors

Re: Interconnection Process Enhancements Track 3

Dear Chair Borenstein and Members of the Board,

The California Community Choice Association (CalCCA) respectfully submits this letter to the California Independent System Operator (CAISO) Board of Governors regarding CAISO management's Interconnection Process Enhancements (IPE) Track 3 proposal (Proposal), which will be discussed at the March 27, 2025, meeting. CalCCA asks that the CAISO Board of Governors direct management to adopt the Proposal, commit to considering the issue of energy-only (EO) resources in Cluster 15, and later seeking transmission plan deliverability (TPD) in the next IPE initiative.

CalCCA is a trade association representing the interests of 24 community choice aggregators (CCA) in California. CalCCA's membership serves over 14 million customers in over 200 cities and counties throughout the state, representing 30 percent of CAISO load. As load-serving entities (LSE) actively procure new electric generating resources to serve California customers, California CCAs have a direct interest in ensuring an efficient and effective interconnection process that supports the accelerated pace of clean energy resource development.

The Proposal advances much-needed modifications to the TPD allocation methodology. The Proposal will: (1) allow generators to interconnect up to an amount that will not trigger the need for a long lead-time (LLT) grid upgrade to provide opportunities for projects to come online and obtain deliverability more quickly when there is headroom; (2) modify the TPD allocation process to align with recent changes to the interconnection process developed in Track 2 of the IPE initiative; and (3) develop a process for reserving TPD for LLT generation by enabling certain resources to delay their first attempt to seek TPD to better align with commercial development and procurement timelines.

CalCCA supports the Proposal, contingent upon the CAISO committing to revisiting to the issue of EO resources in Cluster 15 and later in the next IPE initiative. The Proposal prohibits EO projects in Cluster 15 and later from seeking a TPD allocation at any point in the future after obtaining EO interconnection, to prevent resource developers from utilizing the EO pathway to circumvent a competitive process for TPD allocation. While CalCCA supports the intent to prevent circumventing the competitive process, there are legitimate reasons why projects may pursue interconnection via the EO process and then later seek TPD, including a willingness on the part of both developers and LSEs to contract for a period of time for EO deliveries. It may, therefore, be advantageous for the CAISO to allow EO resources to submit new interconnection requests and score those resources along with all other projects seeking TPD. The Proposal states that CAISO staff has considered the issue of EO resources seeking TPD, identified several policy issues that need to be discussed with stakeholders, and determined that the issue will need to be deferred to a future IPE initiative. Given the potential for EO

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resources to accelerate the pace of clean energy resource development, the CAISO should consider the issue of EO resources seeking TPD in the next IPE initiative.

For the reasons described herein, CalCCA respectfully requests adoption of the IPE Track 3 Proposal with the commitment to consider the issue of EO resources seeking TPD in the next IPE initiative.

Respectfully,

A handwritten signature in black ink, appearing to read "Eric Little", with a stylized flourish extending to the right.

Eric Little
Director of Market Design
CALIFORNIA COMMUNITY CHOICE ASSOCIATION