



May 28, 2024

Board of Governors
California Independent System Operator (CAISO)
250 Outcropping Way
Folsom CA 95630
Via Email

Re: Interconnection Process Enhancement (IPE) Track 2 Proposal

Dear Board of Governors

On behalf of the Center for Energy Efficiency and Renewable Technologies (CEERT) I am writing to support the adoption of CAISO management's IPE Track 2 proposal. CEERT has been impressed with the thoughtful and participatory approach that has been used in developing this proposal. We believe it is now time to move forward with its adoption and filing at the Federal Energy Regulatory Commission (FERC).

The need to move forward with the study process for Cluster 15 interconnection requests is urgent to maintain procurement momentum in meeting California's climate policy goals. The IPE Track 2 proposal, once approved, will enable the study process to commence in an expeditious manner and inform the understanding of any needed network upgrades.

CEERT understands that transmission constraints are increasing as Load Serving Entities (LSEs) seek to procure more renewable energy sources. It is important that the transmission planning process, the interconnection study process and LSE procurement processes overcome these constraints through a coordinated approach. We believe that the IPE Track 2 proposal helps in that regard and can be implemented in a reasonable period of time.

It is CEERT's view that commercial interest is an essential part of determining the readiness of clean energy projects for financing and construction. LSEs have a responsibility to their customers to exercise due diligence in the selection of resources that meet their clean energy and reliability needs. To that end it will be necessary for the CAISO to provide information about transmission constraints to LSEs as prescribed by FERC Order 2023 and as set forth in the IPE Track 2 proposal in a timely manner.

CEERT understands the concern that LSE procurement processes be fair and transparent. We believe that there are adequate governance structures in place to assure that the concerns of project developers will be heard by the various LSEs in California.

CEERT notes that the proposed Merchant interconnection option preserves the important principle of open access to the California transmission system. In the event that there is not sufficient transmission deliverability in the currently planned system to

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meet procurement needs it will be important that there continues to be a viable path for project development which the Merchant interconnection option provides. It is CEERT's preference that transmission system expansion largely occurs through the Transmission Planning Process. However, creating the opportunity for project-funded network upgrades is a reasonable approach to providing resource deliverability in constrained areas of the grid.

CEERT appreciates the hard work put in by the CAISO staff and stakeholders in bringing the IPE Track 2 proposal forward. CEERT also recognizes that there is more work to be done in the upcoming Track 3 process.

Given these considerations, CEERT respectfully requests that the CAISO Board of Governors support the IPE Track 2 proposal.

V. John White

Executive Director