



Independent Energy Producers Association

MAY 29, 2024

California ISO
Board of Governors
P.O. Box 639014
Folsom, CA 95630

RE: Interconnection Process Enhancements 2023 Final Proposal

Dear Board of Governors:

The Independent Energy Producers writes to expand on our comments for the Interconnection Process Enhancements 2023 Final Proposal. We are appreciative of the time and attention ISO staff has taken on our and other stakeholders' comments. Although an addendum was added to the Final Proposal, our concerns remain about issues of non-discriminatory access to the queue, specifically the points allotted to LSEs for up to three self-build projects or 25 percent of their MW allocation per cluster, whichever is greater. Our concern is the competitive procurement process not being undermined.

ISO's Revised Addendum and Final Proposal ("the Proposal") sought to limit the LSE's self-build point allocations with listing expectations for LSE's but these guidelines do not have teeth and will not guarantee non-discriminatory access to the queue. The Proposal jumped from one self-build project to three between the Draft Final Proposal and the Proposal, even though stakeholders had expressed concern with the amount of points an LSE project could receive just within the "commercial interest" category of the Draft Final Proposal. Increasing the amount of self-build projects to three, while still limiting non-LSE interest projects to one per cluster based off historical cluster data, is not recognizing the growth of the projects that will come online with new electrification goals and the amount of competition vying for interconnection queue spots. IEP does not support the allotment of up to three self-build projects, or 25 percent of an LSE allocation per cluster and recommends going forward with the proposal of one self-build project as put forward in the Draft Final Proposal with a reevaluation following a review of data around utility self-build projects in Clusters 15 and 16.

IEP understands the balance ISO staff must weigh between the stakeholders' comments and appreciates their efforts to guide LSEs in a public-facing, fair procurement process, however, IEP cannot support the Proposal. The IEP recommends the Board task the market monitoring unit (MMU) of the California ISO to monitor the procurement process of LSEs when choosing their self-build projects by identifying potential anticompetitive behavior by market participants in the interconnection queue. If the MMU does identify such behavior, IEP would urge the Public Utilities Commission and the FERC to investigate.

IEP appreciates the opportunity to engage further in the Interconnection Process Enhancements 2023 Final Proposal and we respectfully request consideration of our comments prior to your vote.

Sincerely,



Jan Smutny-Jones, Esq.
Chief Executive Officer, General Counsel
INDEPENDENT ENERGY PRODUCERS ASSOCIATION