

## Attachment A

### Interconnection Process Enhancements 5.0 Initiative

Stakeholder comments on the final proposal (December 12, 2025) and revised final proposal (February 25, 2026)<sup>1</sup>

April 2026

Non-LSE commercial interest process (final proposal comments)	
Stakeholder comment theme	ISO response
Stakeholders generally support eliminating the sustainability attestation requirement, with no opposition expressed.	None
Cap on full allocation election (final proposal comments)	
Stakeholder comment theme	ISO response
Broad support exists for the revised methodology, but a few stakeholders believe the 500 MW cap may be unnecessarily restrictive.	The 500 MW level is based on the 95th percentile of the interconnection service capacity of all projects shown in the queue report that have reached commercial operation. The largest (100th percentile) is 850 MW.
Distribution system interconnection projects in intake scoring and 150% study limit (final proposal comments)	
Stakeholder comment theme	ISO response
General support exists, but several stakeholders requested additional clarification regarding implementation mechanics, including WDAT alignment, study timing coordination, and treatment of distribution-level project eligibility under existing tariff structures.	The ISO is meeting with stakeholders individually to answer specific detailed questions, and will clarify additional details in draft tariff language, which stakeholders will have an opportunity to review before the ISO submits its filing to FERC.
Allowing operational energy only projects to seek deliverability (revised final proposal comments)	
Stakeholder comment theme	ISO response
Stakeholders broadly support establishing a pathway for operational energy only projects to seek deliverability, recognizing this as a meaningful improvement that could enhance reliability, resource adequacy, and project financing opportunities.	None

<sup>1</sup> Comments captured include feedback on the most recent round of comments received on the specific topic area, as noted.

A number of stakeholders view the ISO's revised final proposal to be an elegant solution which provides energy only with a more meaningful and equitable opportunity to seek deliverability, while still protecting projects in the interconnection queue.	None
One stakeholder remained concerned that the revised final proposal does not allow energy only projects to have new delivery capacity built to meet their needs when insufficient capacity exists for the project.	The ISO believes the revised proposal is the appropriate step to expand the opportunities for operational energy only project's eligibility for deliverability. If after gaining two or more years of experience with the proposed changes, additional changes are deemed to be needed, the ISO will consider appropriate changes at that time.
One stakeholder generally supported the proposal but expressed concerns with the limitations on the ability to transfer deliverability to and from an energy only project in operation.	Deliverability is provided to projects that meet specific criteria within a competitive process. Limitations on deliverability transfers for operational energy only projects are intended to uphold project viability screens through which projects must pass in order to obtain deliverability.
<b>Application of commercial viability criteria to all projects in the queue (revised final proposal comments)</b>	
<b>Stakeholder comment theme</b>	<b>ISO response</b>
One stakeholder appreciates the ISO's clarifications on the application of Commercial Viability Criteria going forward.	None
One stakeholder while supporting the expansion of CVC to energy only projects continues to oppose the one-time limit for the PPA "grace period." If the ISO proceeds with this proposal they requests that the CAISO clarify that it would only apply going forward.	Interconnection customers will coordinate with their project's off-taker immediately when project issues arise. Providing all projects in queue more chances to remain in queue is not productive to ongoing cluster study results, whereby later cluster study results will likely trigger more costly upgrades with longer completion timelines.
<b>ISO as an affected system process modifications (final proposal comments)</b>	
<b>Stakeholder comment theme</b>	<b>ISO response</b>
Stakeholders generally support the proposed modifications to the affected system study process and sequencing methodology.	None
<b>Modify commercial readiness deposit due date (final proposal comments)</b>	
<b>Stakeholder comment theme</b>	<b>ISO response</b>

Stakeholders support the proposed modifications to the commercial readiness deposit due date and view the change as reasonable and practical.	None
<b>Discontinue pre-application process (final proposal comments)</b>	
<b>Stakeholder comment theme</b>	<b>ISO response</b>
Two stakeholders oppose discontinuing the Pre-Application process unless CAISO improves transparency and access to critical interconnection and substation feasibility data.	The ISO is continuously working to improve the quality and timeliness of the interconnection data that is posted prior to interconnection application windows and will continue to do so. This information is already much more accurate and relevant to project developers than the Pre-Application data.
<b>GIDAP executive dispute committee modifications (final proposal comments)</b>	
<b>Stakeholder comment theme</b>	<b>ISO response</b>
The ISO received limited but generally supportive comments on this proposal.	None