California Independent System Operator Corporation

July 14, 2025

The Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: California Independent System Operator Corporation
Docket No. ER24-2042-___

Tariff Amendment to Comply with Order on Compliance

Dear Secretary Reese:

The California Independent System Operator Corporation ("CAISO") submits this tariff amendment to comply with the Commission's order[1] on the CAISO's initial compliance filing with Order No. 2023 ("Compliance Order"),[2] which the Commission issued to "ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner, and [which] will prevent undue discrimination."[3] The Compliance Order widely accepted the CAISO's initial compliance filing, and only required iterative compliance on a few minor issues, which the CAISO addresses here. On each issue the CAISO proposes to revise its tariff consistent with Order No. 2023.

I. Compliance with Order

A. Overview and Timeline

The Compliance Order found that the CAISO adjusted its cluster study provisions and timeline to conform to Order No. 2023 requirements with regard to scope and

[1] *California Independent System Operator Corp.,* 191 FERC ¶ 61,119 (2025).

[2] *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023 184 FERC ¶ 61,054 (2023) ("Order No. 2023"), *order on reh'g & clarification*, Order No. 2023-A, 186 FERC ¶ 61,199 (2024) ("Order No. 2023-A"). Order Nos. 2023 and 2023-A are sometimes referred to collectively in this transmittal letter as "Order No. 2023," but not where distinguishing between those two Commission issuances is necessary.

[3] The CAISO submits this filing pursuant to section 205 of the Federal Power Act ("FPA"), 16 U.S.C. § 824d. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO tariff, and references to specific sections, articles, and appendices are references to sections, articles, and appendices in the current CAISO tariff and revised or proposed in this filing, unless otherwise indicated.

schedules by adopting the Commission's *pro forma* LGIP and *pro forma* LGIA. However, the Commission found that the CAISO inadvertently retained some anachronistic references to the Phase I or Phase II study instead of Cluster Study and Interconnection Facilities Study.[4] The CAISO proposes to replace those references with the correct study terms.[5]

B. Cluster Study Commencement

The Compliance Order found that the CAISO's proposed Resource Interconnection Standards ("RIS") section 6.6, cluster study procedures, partially complied with the requirements of Order Nos. 2023 and 2023-A.[6] The Compliance Order directs the CAISO to revise Section 6.6 to require the CAISO to complete the cluster study within 150 days of the close of the customer engagement window instead of from the date the cluster study begins. The CAISO proposes to revise Section 6.6 accordingly.

C. Cost Allocation for Specific Network Upgrades

The Compliance Order found that the CAISO partially complied with the network upgrade cost allocation requirements of Order Nos. 2023 and 2023-A.[7] The Commission accepted the CAISO's proposed cost allocation tariff provisions for interconnection facilities and various classes of network upgrades, but not for Interconnection Reliability Network Upgrades ("IRNUs")—the CAISO's pre-existing term for substation network upgrades. The Commission directed the CAISO to either adopt (1) the *pro forma* definition of "proportional impact method," and (2) the *pro forma* provisions for allocating the costs of IRNUs, or justify these variations under the independent entity variation standard.[8]

The CAISO assigns IRNU costs consistent with Order No. 2023 and section 4.2.1(a) of the *pro forma* LGIP, namely, *per capita* to the interconnection customers connecting to the IRNU. This was the CAISO's practice before Order No. 2023, as described in Sections 6.3.1 and 8.3 of the Generator Interconnection and Deliverability Allocation Procedures ("GIDAP"), the predecessor to the RIS. The CAISO's initial

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[4] Compliance Order at P 67. The Compliance Order noted the references in Section 8.7 of the RIS; however, references also appear in Sections 5.2.1.2 and 5.5.4, which the CAISO proposes to remove as well.

[5] Proposed Sections 5.2.1.2, 5.5.4, and 8.7 of the RIS. Consistent with the Compliance Order, the CAISO notes that the reference to "Interconnection Customers with complete Phase II Interconnection Studies or Interconnection Facilities Studies" in Section 7.4.3(ii) is correct because it refers to the annual reassessment process, which includes interconnection customers under the GIDAP that would have Phase II studies.

[6] Compliance Order at PP 73-74.

[7] Compliance Order at P 88-89.

[8] Compliance Order at P 90.

compliance filing inadvertently removed the key IRNU provisions of Section 8.3 without replacing them in Section 6.3.1 of the RIS. The CAISO thus proposes to restore that language in Section 6.3.1 of the RIS.[9] This will specify that the CAISO will allocate assigned IRNU costs proportional to the number of interconnection requests assigned the IRNU in the current queue cluster, and the Current Cost Responsibility will reflect the allocated costs of IRNU.

The CAISO will still maintain the language specifying that interconnection customers' Maximum Cost Responsibility will include the full cost of the IRNU. This does not conflict with Order No. 2023 because Maximum Cost Responsibility is a unique feature of the CAISO that sets the firm cost cap for the interconnection customer: Any costs beyond the Maximum Cost Responsibility are borne by the transmission owner. The Current Cost Responsibility sets the commercial readiness and GIA deposit amounts, and cannot exceed the Maximum Cost Responsibility.

As the CAISO explained in detail in 2019 when it created the IRNU classification,[10] unlike most other upgrades, if IRNUs are assigned to multiple interconnection customers, the costs do not decrease as interconnection customers withdraw. Any interconnection customer assigned such an upgrade should therefore understand up-front that if other interconnection customers that share the upgrade withdraw, its share of the upgrade will rise. In other words, interconnection customers should understand that the risk profile for the costs of these upgrades is different. The CAISO has observed, however, that this is not always the case, and many interconnection customers linger in the queue hoping that such costs will decrease or go away. Unlike in other ISO/RTOs, the CAISO's firm cost caps protect interconnection customers from cascading costs and restudies once an interconnection customer has executed a GIA. Even if the interconnection customer later withdraws, the transmission owner inherits the costs, not later-queued interconnection customers.[11]

This can be risky where an interconnection customer in an earlier interconnection queue has been assigned an IRNU before a later-queued customer. The later-queued interconnection customer also is assigned the cost of the upgrade,[12] but might remain in queue because it hopes the earlier queued customer will execute a GIA, making it and the transmission owner responsible for the costs (and removing cost responsibility from the later customer).[13] Because these upgrades are typically very expensive, they are

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9 The CAISO also proposes to remove less clear, redundant language that attempted the same.

10 *California Independent System Operator Corp.,* Letter Order, Docket No. ER19-2679-000 (Oct. 18, 2019).

11 Section 14.2.2 of the RIS and the GIDAP.

12 So long as no earlier customer has executed a GIA. Section 14.2.2 of Appendix DD to the CAISO tariff.

13 *Id*.

the most likely to cause interconnection customers to withdraw before executing a GIA, causing the later queued customer to inherit the costs of the upgrade.

Transmission owners also expressed that developers attempted to game the cost caps to escape cost responsibility for IRNUs before the classification was established. For example, a developer could submit an interconnection request in 2018, which is assigned an expensive substation upgrade. The same developer could then submit an identical interconnection request in 2019, which also would be assigned the same upgrade. If the developer executes a GIA for the 2018 request, the 2019 request would no longer be financially responsible for the upgrade. The developer could then withdraw the 2018 request, which would result in the loss of a significant portion of its interconnection financial security; however, this figure would be substantially less than the financing obligation of the 2019 interconnection customer, saving the developer money and making the 2019 project more marketable and profitable.

For these reasons, the CAISO proposed and the Commission accepted, the CAISO's proposal that interconnection customers' Maximum Cost Responsibility includes the full cost of each IRNU until another interconnection customer sharing the IRNU provides its initial financing. This system protects the transmission owner from inheriting the vast majority of the IRNU cost through withdrawals. The interconnection customer meanwhile only must post deposits based on its Current Cost Responsibility, which is based on its *per capita* share of the IRNU cost at the time of the specific posting required.

The CAISO tariff thus complies with Order No. 2023 in allocating IRNUs *per capita* to the interconnection customers sharing the IRNUs, and basing deposit amounts on this allocation.[14] The provisions for IRNU Maximum Cost Responsibility are part of unique CAISO rules approved under the Commission's independent entity standard. The CAISO notes that the Commission expressly re-approved these rules in the Compliance Order.[15]

D. Commercial Readiness

The Compliance Order found that the CAISO's proposed language concerning commercial readiness partially complied with the requirements of Order Nos. 2023 and 2023-A. While accepting the vast majority of the CAISO's proposed language, the Commission noted that "while RIS sections 7.4.1, 8.1.1, and 14.4.1 explicitly provide that the Commercial Readiness Deposit is submitted to the Participating Transmission Owner, RIS sections 3.5.1 and 13.3 do not specify that the interconnection customer will submit a commercial readiness deposit to the Participating Transmission Owner."[16] The

[14] *I.e.*, the Current Cost Responsibility.

[15] Compliance Order at PP 91-94.

[16] Compliance Order at P 112.

Commission thus directed the CAISO to revise those provisions to identify the entity to which the interconnection customer will submit a commercial readiness deposit. The CAISO proposes to revise both sections to reiterate that interconnection customers submit commercial readiness deposits to the participating transmission owner.[17] The CAISO also proposes to make a similar edit to Section 11.1 of the RIS, which erroneously states that the CAISO will place deposits in an interest-bearing account at a bank or financial institution designated by the CAISO instead of the Participating Transmission Owners doing so at their designated institutions.[18]

E. Affected System *Pro Forma* Agreements

The Compliance Order found that the CAISO complied with all substantive requirements for affected systems, but failed to add definitions of Multiparty Affected System Facilities Construction Agreement and Multiparty Affected System Study Agreement.[19] The Commission directed the CAISO to add those terms to Appendix A to the CAISO tariff, which the CAISO proposes to do.[20]

F. Incorporating the Enumerated Alternative Transmission Technologies

The Compliance Order found that the CAISO's proposed language concerning alternative transmission technologies partially complied with the requirements of Order Nos. 2023 and 2023-A.[21] While accepting most of the CAISO's proposed language, the Commission found that the CAISO omitted "Applicable Reliability Standards" from the *pro forma* LGIP section 7.3 that the Commission added in Order No. 2023-A.[22] The Commission thus directed the CAISO to either justify the proposed omission of this language under the independent entity variation standard or adopt it without modification. The CAISO proposes to add the phrase.[23]

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[17] Proposed Sections 3.5.1 and 13.3 of the RIS. The CAISO also corrects that the form must be reasonably acceptable to the Participating TO (not the CAISO), consistent with Section 11.1 of the RIS and Order No. 2023's prescribed list of acceptable forms.

[18] Proposed Section 11.1 of the RIS.

[19] Compliance Order at P 178.

[20] *See* proposed "Multiparty Affected System Facilities Construction Agreement" and "Multiparty Affected System Study Agreement," Appendix A to the CAISO tariff.

[21] Compliance Order at PP 197-198.

[22] Order No. 2023-A at PP 623-25.

[23] Proposed Section 6.2 of the RIS.

II. Effective Date

The CAISO requests that the Commission accepted these further tariff revision effective to May 17, 2024, the effective date accepted by the Commission in the Compliance Order.[24]

III. Contents of Filing

Besides this transmittal letter, this filing includes these attachments:

Att. A — Clean CAISO tariff sheets incorporating this tariff amendment

Att. B — Red-lined document showing the revisions in this tariff amendment[25]

IV. Conclusion

For the reasons set forth above, the CAISO respectfully requests that the Commission find that the CAISO complies with the Compliance Order.

Respectfully submitted,

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[24] Compliance Order at P 1.

[25] Incorporated in tariff records for this filing, the CAISO is modifying the formatting of the section headers in Appendix KK, Section 4 for consistency. Additionally, the CAISO is updating the Appendix A definition for Generating Facility Capacity to convey the redlines as proposed in the initial tariff amendment in this docket properly. Finally, the CAISO is establishing the proper child-to-parent relationship for the new tariff records in Appendices KK, LL, and MM in FERC's eTariff. For all tariff records that have a subsequent effective date after May 17, 2024, additional tariff records are included to ensure the historical versions are updated as well as the current version as of the subsequent effective dates.

Attachment A – Clean Tariff Sheets

Second Compliance Filing - FERC Order No. 2023

California Independent System Operator Corporation

July 14, 2025

Appendix A

- Generating Facility Capacity

The net capacity of the Generating Facility or the aggregate net capacity of the Generating Facility where it includes more than one Generating Unit for the production and/or storage for later injection of electricity.

- Multiparty Affected System Facilities Construction Agreement

The agreement contained in Appendix 14 to the RIS that is made between the Participating TO and multiple Affected System Interconnection Customers to facilitate the construction of and to set forth cost responsibility for necessary Affected System Network Upgrades on the CAISO Controlled Grid.

- Multiparty Affected System Study Agreement

The agreement contained in Appendix 12 to the RIS that is made among the CAISO, Participating TO, and multiple Affected System Interconnection Customers to conduct an Affected System Study pursuant to Section 14 of the RIS.

Appendix KK

Resource Interconnection Standards (RIS)

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Section 3 Interconnection Requests

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3.5 Processing of Interconnection Requests

3.5.1 Initiating an Interconnection Request.

An Interconnection Customer seeking to join a Queue Cluster will submit its Interconnection Request to the CAISO within, and no later than the close of, the Cluster Application Window. Interconnection Requests submitted outside of the Cluster Application Window will not be considered. To initiate an Interconnection Request except as set forth for the Fast Track Process in Section 5, and have the Interconnection Request considered for validation under Section 3.5.2, the Interconnection Customer must submit all of the following during the Cluster Application Window:

(i) Applicable Interconnection Study Deposit amount, pursuant to Section 3.5.1.1 of this RIS.

(ii) A completed application in the forms of Appendix 1 and Appendix 2, including requested Deliverability statuses, requested study process (either Queue Cluster or Fast Track Study Process), preferred Point of Interconnection and voltage level, and all other required technical data, including all data requested in Attachment A to Appendix 1 in Excel format.

(iii) Demonstration of no less than ninety percent (90%) Site Control; or (1) a signed affidavit from an officer of the company indicating that Site Control is unobtainable due to regulatory limitations as defined in the Business Practice Manuals; (2) documentation sufficiently describing and explaining the source and effects of such regulatory limitations, including a description of any conditions that must be met to satisfy the regulatory limitations and the anticipated time by which the Interconnection Customer expects to satisfy the regulatory requirements; and (3) a deposit in lieu of Site Control of $10,000 per MW, subject to a minimum of $500,000 and a maximum of $2,000,000. Interconnection Requests from multiple Interconnection Customers for multiple Generating Facilities that share a site must include a contract or other agreement that allows for shared land use.

(iv) A load flow model.

(v) A dynamic data file.

(vi) A reactive power capability document.

(vii) A site drawing.

(viii) A single-line diagram.

(ix) A flat run plot, bump test plot, voltage reference step change test plot, frequency reference step change test, and a voltage ride-through test plot from the positive sequence transient stability simulation application.

(x) A plot showing the requested MW at the Point of Interconnection from the positive sequence load flow application.

(xi) A Commercial Readiness Deposit submitted to the Participating TO equal to two times the study deposit described in Section 3.5.1.1 of this RIS in the form of an irrevocable letter of credit, cash, a surety bond, or other form of security that is reasonably acceptable to the Participating TO under Section 11.1 of this RIS. This Commercial Readiness Deposit is refunded to Interconnection Customer according to Section 3.8 of this RIS.

(xii) If applicable, (a) the requested operating assumptions (*i.e.*, whether the interconnecting Generating Facility will or will not charge at peak load) to be used by the CAISO and Participating TO that reflect the proposed charging behavior of the Generating Facility that includes at least one electric storage resource, and (2) a description of any control technologies (software and/or hardware) that will limit the operation of the Generating Facility to the operating assumptions submitted by the Interconnection Customer.

(xiii) All supporting documentation required for the Interconnection Customer's selections on Appendix 2, as required by Section 4 of this RIS.

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Section 4 Cluster Study Criteria

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4.1 Criteria for Requests for Deliverability in Deliverable Zones

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4.1.1 Scoring Criteria

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4.1.1.1 Load Serving Entity Points

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4.1.2 Auction Process

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4.2 Criteria for Requests for Deliverability in Merchant Zones

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4.3 Criteria for Energy Only Requests Eligible for Cash Reimbursement

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4.3.1 Load Serving Entity Points

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4.4 Criteria for Energy Only Requests Ineligible for Cash Reimbursement

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Section 5 Fast Track Process

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5.2 Initial Review

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5.2.1 Screens

5.2.1.1 The proposed Generating Facility's Point of Interconnection must be on the CAISO Controlled Grid.

5.2.1.2 For interconnection of a proposed Generating Facility to a radial transmission circuit on the CAISO controlled grid, the aggregated generation on the circuit, including the proposed Generating Facility, shall not exceed 15 percent of the line section annual peak load as most recently measured at the substation. For purposes of this Section 5.2.1.2, a line section shall be considered as that portion of a Participating TO's electric system connected to a customer bounded by automatic sectionalizing devices or the end of the transmission line.

This screen will not be required for a proposed interconnection of a Generating Facility to a radial transmission circuit with no load.

In cases where the circuit lacks the telemetry needed to provide the annual peak load measurement data, the CAISO shall use power flow cases from the latest completed Queue Cluster studies to perform this screen.

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5.5 Supplemental Review

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5.5.4 Within thirty (30) Business Days following receipt of the deposit for a supplemental review, or some longer period agreed to by the Interconnection Customer, CAISO, and Participating TO, the CAISO and Participating TO shall (1) perform a supplemental review using the screens set forth below; (2) notify in writing the Interconnection Customer of the results; and (3) include with the notification copies of the analysis and data underlying the CAISO and Participating TO's determinations under the screens. Unless the Interconnection Customer provided instructions for how to respond to the failure of any of the supplemental review screens below at the time the Interconnection Customer accepted the offer of supplemental review, the CAISO and Participating TO shall notify the Interconnection Customer following the failure of any of the screens, or if they are unable to perform the screen in Section 5.5.4.1, within two (2) Business Days of making such determination to obtain the Interconnection Customer's permission to: (1) continue evaluating the proposed interconnection under this Section 5.5.4; (2) terminate the supplemental review and offer the Interconnection Customer the options set forth in Section 5.4.3; or (3) terminate the supplemental review upon withdrawal of the Interconnection Request by the Interconnection Customer.

In conducting these screens, the CAISO and Participating TO will use power flow or short circuit study data from the most recently completed Queue Cluster studies.

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Section 6 Cluster Study Process

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6.2. Scope and Purpose of Cluster Study

The Cluster Study will:

(i) evaluate the impact of all Interconnection Requests received during the Cluster Application Window for a particular year on the CAISO Controlled Grid;

(ii) identify all LDNUs and RNUs needed to address the impacts on the CAISO Controlled Grid of the Interconnection Requests, as Assigned Network Upgrades or Conditionally Assigned Network Upgrades;

(iii) preliminarily identify for each Interconnection Request required Interconnection Facilities;

(iv) assess the Point of Interconnection selected by each Interconnection Customer and potential alternatives to evaluate potential efficiencies in overall transmission upgrades costs;

(v) establish the estimated, non-binding Current Cost Responsibility, Maximum Cost Responsibility, and Maximum Cost Exposure for each Interconnection Request, until the issuance of the Interconnection Facilities Study report;

(vi) provide a cost estimate of ADNUs for each Generating Facility in a Queue Cluster Study;

(vii) identify controls required for each Interconnection Request where the Interconnection Customer requested Interconnection Service Capacity lower than the Generating Facility Capacity;

(viii) identify any Precursor Network Upgrades; and

(ix) identify RNUs as GRNUs or IRNUs.

The Cluster Study will consist of a short circuit analysis, a stability analysis to the extent the CAISO and applicable Participating TO(s) reasonably expect transient or voltage stability concerns, a power flow analysis, including off-peak analysis, and an On-Peak Deliverability Assessment, for the purpose of identifying LDNUs and estimating the cost of ADNUs, as applicable.

The Cluster Study will state for each subgroup or Interconnection Request studied individually (i) the assumptions upon which it is based, (ii) the results of the analyses, and (iii) the requirements or potential impediments to providing the requested Interconnection Service to all Interconnection Requests in a subgroup or to the Interconnection Request studied individually.

The Cluster Study will provide, without regard to the requested Commercial Operation Dates of the Interconnection Requests, a list of RNUs, and LDNUs to the CAISO Controlled Grid that are preliminarily identified as Assigned Network Upgrades or Conditionally Assigned Network Upgrades required as a result of the Interconnection Requests in a subgroup or as a result of any

Interconnection Request studied individually and Participating TO's Interconnection Facilities associated with each Interconnection Request, the estimated costs of ADNUs, if applicable, and an estimate of any other financial impacts (i.e., on Local Furnishing Bonds). For purposes of determining necessary Interconnection Facilities and Network Upgrades, the Cluster Study will consider the level of Interconnection Service Capacity requested by the Interconnection Customer, unless otherwise required to study the full Generating Facility Capacity due to safety or reliability concerns.

For purposes of determining necessary Interconnection Facilities and Network Upgrades, the Cluster Study will use operating assumptions (*i.e.*, whether the interconnecting Generating Facility will or will not charge at peak load) that reflect the proposed charging behavior of a Generating Facility that includes at least one electric storage resource as requested by the Interconnection Customer, unless the CAISO determines that Good Utility Practice, including Applicable Reliability Standards, otherwise requires the use of different operating assumptions. The CAISO may require the inclusion of control technologies sufficient to limit the operation of the Generating Facility per the operating assumptions as set forth in the Interconnection Request and to respond to dispatch instructions by the CAISO. As determined by the CAISO, the Interconnection Customer may be subject to testing and validation of those control technologies consistent with Article 6 of the LGIA and Article 2 of the SGIA.

The Cluster Study will evaluate the use of static synchronous compensators, static VAR compensators, advanced power flow control devices, transmission switching, synchronous condensers, voltage source converters, advanced conductors, and tower lifting. The CAISO and Participating TO will evaluate each identified alternative transmission technology and determine whether the above technologies should be used, consistent with Good Utility Practice, Applicable Reliability Standards, and Applicable Laws and Regulations. The CAISO and Participating TO will include an explanation of the results of the evaluation for each technology in the Cluster Study Report.

6.3 Identification of and Cost Allocation for Network Upgrades

6.3.1 Reliability Network Upgrades (RNUs).

The CAISO, in coordination with the applicable Participating TO(s), will perform short circuit and stability analyses for each Interconnection Request either individually or as part of a subgroup to preliminarily identify the RNUs needed to interconnect the Generating Facilities to the CAISO Controlled Grid. The CAISO, in coordination with the applicable Participating TO(s), shall also perform power flow analyses, under a variety of system conditions, for each Interconnection Request either individually or as part of a subgroup to identify Reliability Criteria violations, including applicable thermal overloads, that must be mitigated by RNUs.

The cost of all RNUs identified in the Cluster Study shall be estimated in accordance with Section 6.4. The estimated costs of short circuit related GRNUs identified through a subgroup shall be assigned to all Interconnection Requests in that subgroup pro rata on the basis of the short circuit duty contribution of each Generating Facility. The estimated costs of all other GRNUs identified through a subgroup shall be assigned to all Interconnection Requests in that subgroup pro rata on the basis of the maximum megawatt electrical output of each proposed new Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request. The estimated costs of RNUs identified as a result of an Interconnection Request studied separately shall be assigned solely to that Interconnection Request. The CAISO will allocate assigned IRNU costs proportional to the number of Interconnection Requests that have been assigned the IRNU in the current Queue Cluster. The Current Cost Responsibility will reflect the allocated costs of IRNUs.

The Interconnection Customer's Maximum Cost Responsibility will include the full cost of Assigned Network Upgrades that are Interconnection Reliability Network Upgrades until another Interconnection Customer in the same Queue Cluster provides its payment under Article 5.6.4 of the GIA for the assigned Interconnection Reliability Network Upgrade, in which case the CAISO will reduce the Interconnection Customer's Maximum Cost Responsibility to its allocated share.

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6.6 Cluster Study Procedures

The CAISO shall coordinate the Cluster Study with applicable Participating TO(s) pursuant to Section 3.2 and any Affected System that is affected by the Interconnection Request pursuant to Section 3.7. Existing studies shall be used to the extent practicable when conducting the Cluster Study. The CAISO will coordinate Base Case development with the applicable Participating TOs to ensure the Base Cases are accurately developed. The CAISO will complete and issue to Interconnection Customers the Cluster Study report within one hundred and fifty (150) days after the close of the Customer Engagement Window; however, the Cluster Study may be completed prior to this maximum time where practicable based on factors, including, but not limited to, the number of Interconnection Requests in the Cluster Application Window, study complexity, and reasonable availability of subcontractors as provided under Section 15.2. The CAISO will share applicable study results with the applicable Participating TO(s) for review and comment and will incorporate comments into the study report. The CAISO will issue a final Cluster Study report to the Interconnection Customer.

At any time the CAISO determines that it will not meet the required time frame for completing the Cluster Study due to the large number of Interconnection Requests in the associated Cluster Application Window, study complexity, or unavailability of subcontractors on a reasonable basis to perform the study in the required time frame, the CAISO shall notify the Interconnection Customers as to the schedule status of the Cluster Study and provide an estimated completion date with an explanation of the reasons why additional time is required.

Upon request, the CAISO shall provide the Interconnection Customer all supporting documentation, workpapers and relevant pre-Interconnection Request and post-Interconnection Request power flow, short circuit and stability databases for the Cluster Study, subject to confidentiality arrangements consistent with Section 15.1.

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Section 8 Interconnection Facilities Study and TP Deliverability Allocation Processes

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8.7 Results Meeting With the CAISO and Applicable PTO(s)

Within thirty (30) calendar days of providing the final Interconnection Facilities Study report to the Interconnection Customer, the applicable Participating TO(s), the CAISO and the Interconnection Customer shall meet to discuss the results of the Interconnection Facilities Study, including selection of the final Commercial Operation Date.

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Section 11 Commercial Readiness Deposit and GIA Deposit

11.1 Types of Commercial Readiness Deposit and GIA Deposit

The Commercial Readiness Deposit and GIA Deposit posted by an Interconnection Customer may be any combination of the following types of Commercial Readiness Deposit or GIA Deposit:

(a) an irrevocable and unconditional letter of credit issued by a bank or financial institution that has a credit rating of A or better by Standard and Poors or A2 or better by Moody's;

(b) an irrevocable and unconditional surety bond issued by an insurance company that has a credit rating of A or better by Standard and Poors or A2 or better by Moody's;

(c) an unconditional and irrevocable guaranty issued by a company has a credit rating of A or better by Standard and Poors or A2 or better by Moody's;

(d) a cash deposit standing to the credit of the applicable Participating TO(s) in an interest-bearing escrow account maintained at a bank or financial institution that is reasonably acceptable to the applicable Participating TO(s);

(e) a certificate of deposit in the name of the applicable Participating TO(s) issued by a bank or financial institution that has a credit rating of A or better by Standard and Poors or A2 or better by Moody's; or

(f) a payment bond certificate in the name of the applicable Participating TO(s) issued by a bank or financial institution that has a credit rating of A or better by Standard and Poors or A2 or better by Moody's.

Commercial Readiness Deposit and GIA Deposit instruments as listed above shall be in such form as the CAISO and applicable Participating TO(s) may reasonably require from time to time by notice to Interconnection Customers or in such other form as has been evaluated and approved as reasonably acceptable by the CAISO and applicable Participating TO(s).

The CAISO shall publish and maintain standardized forms related to the types of deposits listed above which shall be accessible on the CAISO Website. The CAISO shall require the use of standardized forms of Commercial Readiness Deposit and GIA Deposit to the greatest extent possible. If at any time the guarantor of the Commercial Readiness Deposit or GIA Deposit fails to maintain the credit rating required by this Section, the Interconnection Customer shall provide to the applicable Participating TO(s) replacement Commercial Readiness Deposit or GIA Deposit meeting the requirements of this Section within five (5) Business Days of the change in credit rating.

The Participating TO shall, upon receipt, deposit all Commercial Readiness Deposit, GIA Deposit, and other deposit amounts in an interest-bearing account at a bank or financial institution designated by the Participating TO. Interest on a cash deposit standing to the credit of the applicable Participating TO(s) in an interest-bearing escrow account under subpart (d) of this Section will accrue to the Interconnection Customer's benefit and will be added to the Interconnection Customer's account on a monthly basis. Any interest earned on such amounts, based on the actual rate of the account, shall be allocated and disbursed in the same manner as the principal, in accordance with the methodology set forth in this Section 7.6

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Section 13 Generator Interconnection Agreement (GIA)

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13.3 Execution and Filing

The Interconnection Customer shall either: (i) execute the appropriate number of originals of the tendered GIA as specified in the directions provided by the CAISO and return them to the CAISO, as directed, for completion of the execution process; or (ii) request in writing that the applicable Participating TO(s) and CAISO file with FERC a GIA in unexecuted form. The GIA shall be considered executed as of the date that all three Parties have signed the GIA. As soon as practicable, but not later than ten (10) Business Days after receiving either the executed originals of the tendered GIA (if it does not conform with a FERC-approved standard form of interconnection agreement) or the request to file an unexecuted GIA, the applicable Participating TO(s) and CAISO shall file the GIA with FERC, as necessary, together with an explanation of any matters as to which the Interconnection Customer and the applicable Participating TO(s) or CAISO disagree and support for the costs that the applicable Participating TO(s) propose to charge to the Interconnection Customer under the GIA. An unexecuted GIA should contain terms and conditions deemed appropriate by the applicable Participating TO(s) and CAISO for the Interconnection Request. If the Parties agree to proceed with design, procurement, and construction of facilities and upgrades under the agreed-upon terms of the unexecuted GIA, they may proceed pending FERC action.

Simultaneously with submitting the executed GIA, or within ten (10) Business Days after the Interconnection Customer requests that the CAISO file the GIA unexecuted at FERC, the Interconnection Customer shall provide the following: (1) demonstration of continued Site Control pursuant to Section 8.1.1(2) of this RIS provided to the CAISO; and (2) the GIA Deposit provided to the Participating TO equal to twenty percent (20%) of Interconnection Customer's estimated Network Upgrade costs identified in the draft GIA minus the total amount of Commercial Readiness Deposits that Interconnection Customer has provided to the Participating TO for its Interconnection Request. The Participating TO shall use the GIA Deposit as (or as a portion of) the Interconnection Customer's security required under GIA Article 11.5. The Interconnection Customer may not request to suspend its GIA under GIA Article 5.16 until Interconnection Customer has provided (1) and (2) to the CAISO and Participating TO. If the Interconnection Customer fails to provide (1) and (2) to the CAISO and Participating TO within the thirty (30) days allowed for returning the executed GIA and appendices under RIS Section 13.1.1, or within ten (10) Business Days after the Interconnection Customer requests that the CAISO file the GIA

unexecuted at FERC as allowed in this Section 13.3 of this RIS, the Interconnection Request will be deemed withdrawn pursuant to Section 3.8 of this RIS.

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Attachment B – Marked Tariff Sheets

Second Compliance Filing - FERC Order No. 2023

California Independent System Operator Corporation

July 14, 2025

Appendix A

- Generating Facility Capacity

The net capacity of the Generating Facility or the aggregate net capacity of the Generating Facility ~~where it includes multiple energy production devices~~ where it includes more than one Generating Unit for the production and/or storage for later injection of electricity.

- Multiparty Affected System Facilities Construction Agreement

The agreement contained in Appendix 14 to the RIS that is made between the Participating TO and multiple Affected System Interconnection Customers to facilitate the construction of and to set forth cost responsibility for necessary Affected System Network Upgrades on the CAISO Controlled Grid.

- Multiparty Affected System Study Agreement

The agreement contained in Appendix 12 to the RIS that is made among the CAISO, Participating TO, and multiple Affected System Interconnection Customers to conduct an Affected System Study pursuant to Section 14 of the RIS.

Appendix KK

Resource Interconnection Standards (RIS)

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Section 3 Interconnection Requests

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3.5 Processing of Interconnection Requests

3.5.1 Initiating an Interconnection Request.

An Interconnection Customer seeking to join a Queue Cluster will submit its Interconnection Request to the CAISO within, and no later than the close of, the Cluster Application Window. Interconnection Requests submitted outside of the Cluster Application Window will not be considered. To initiate an Interconnection Request except as set forth for the Fast Track Process in Section 5, and have the Interconnection Request considered for validation under Section 3.5.2, the Interconnection Customer must submit all of the following during the Cluster Application Window:

(i) Applicable Interconnection Study Deposit amount, pursuant to Section 3.5.1.1 of this RIS.

(ii) A completed application in the forms of Appendix 1 and Appendix 2, including requested Deliverability statuses, requested study process (either Queue Cluster or Fast Track Study Process), preferred Point of Interconnection and voltage level, and all other required technical data, including all data requested in Attachment A to Appendix 1 in Excel format.

(iii) Demonstration of no less than ninety percent (90%) Site Control; or (1) a signed affidavit from an officer of the company indicating that Site Control is unobtainable due to regulatory limitations as defined in the Business Practice Manuals; (2) documentation sufficiently describing and explaining the source and effects of such regulatory limitations, including a description of any conditions that must be met to satisfy the regulatory limitations and the anticipated time by which the Interconnection Customer expects to satisfy the regulatory requirements; and (3) a deposit in lieu of Site Control of $10,000 per MW, subject to a minimum of $500,000 and a maximum of $2,000,000. Interconnection Requests from multiple Interconnection Customers for multiple Generating Facilities that share a site must include a contract or other agreement that allows for shared land use.

(iv) A load flow model.

(v) A dynamic data file.

(vi) A reactive power capability document.

(vii) A site drawing.

(viii) A single-line diagram.

(ix) A flat run plot, bump test plot, voltage reference step change test plot, frequency reference step change test, and a voltage ride-through test plot from the positive sequence transient stability simulation application.

(x) A plot showing the requested MW at the Point of Interconnection from the positive sequence load flow application.

(xi) A Commercial Readiness Deposit submitted to the Participating TO equal to two times the study deposit described in Section 3.5.1.1 of this RIS in the form of an irrevocable letter of credit, cash, a surety bond, or other form of security that is reasonably acceptable to the ~~CAISO~~ Participating TO under Section 11.1 of this RIS. This Commercial Readiness Deposit is refunded to Interconnection Customer according to Section 3.8 of this RIS.

(xii) If applicable, (a) the requested operating assumptions (*i.e.*, whether the interconnecting Generating Facility will or will not charge at peak load) to be used by the CAISO and Participating TO that reflect the proposed charging behavior of the Generating Facility that includes at least one electric storage resource, and (2) a description of any control technologies (software and/or hardware) that will limit the operation of the Generating Facility to the operating assumptions submitted by the Interconnection Customer.

(xiii) All supporting documentation required for the Interconnection Customer's selections on Appendix 2, as required by Section 4 of this RIS.

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Section 4 Cluster Study Criteria

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~~Section~~ 4.1 Criteria for Requests for Deliverability in Deliverable Zones

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~~Section~~ 4.1.1 Scoring Criteria

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~~Section~~ 4.1.1.1 Load Serving Entity Points

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~~Section~~ 4.1.2 Auction Process

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~~Section~~ 4.2 Criteria for Requests for Deliverability in Merchant Zones

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~~Section~~ 4.3 Criteria for Energy Only Requests Eligible for Cash Reimbursement

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~~Section~~ 4.3.1 Load Serving Entity Points

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~~Section~~ 4.4 Criteria for Energy Only Requests Ineligible for Cash Reimbursement

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Section 5 Fast Track Process

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5.2 Initial Review

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5.2.1 Screens

5.2.1.1 The proposed Generating Facility's Point of Interconnection must be on the CAISO Controlled Grid.

5.2.1.2 For interconnection of a proposed Generating Facility to a radial transmission circuit on the CAISO controlled grid, the aggregated generation on the circuit, including the proposed Generating Facility, shall not exceed 15 percent of the line section annual peak load as most recently measured at the substation. For purposes of this Section 5.2.1.2, a line section shall be considered as that portion of a Participating TO's electric system connected to a customer bounded by automatic sectionalizing devices or the end of the transmission line.

This screen will not be required for a proposed interconnection of a Generating Facility to a radial transmission circuit with no load.

In cases where the circuit lacks the telemetry needed to provide the annual peak load measurement data, the CAISO shall use power flow cases from the latest completed Queue Cluster studies ~~(either Phase I or Phase II)~~ to perform this screen.

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5.5 Supplemental Review

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5.5.4 Within thirty (30) Business Days following receipt of the deposit for a supplemental review, or some longer period agreed to by the Interconnection Customer, CAISO, and Participating TO, the CAISO and Participating TO shall (1) perform a supplemental review using the screens set forth below; (2) notify in writing the Interconnection Customer of the results; and (3) include with the notification copies of the analysis and data underlying the CAISO and Participating TO's determinations under the screens. Unless the Interconnection Customer provided instructions for how to respond to the failure of any of the supplemental review screens below at the time the Interconnection Customer accepted the offer of supplemental review, the CAISO and Participating TO shall notify the Interconnection Customer following the failure of any of the screens, or if they are unable to perform the screen in Section 5.5.4.1, within two (2) Business Days of making such determination to obtain the Interconnection Customer's permission to: (1) continue evaluating the proposed interconnection under this Section 5.5.4; (2) terminate the supplemental review and offer the Interconnection Customer the options set forth in Section 5.4.3; or (3) terminate the supplemental review upon withdrawal of the Interconnection Request by the Interconnection Customer.

In conducting these screens, the CAISO and Participating TO will use power flow or short circuit study data from the most recently completed Queue Cluster studies ~~(either Phase I or Phase II)~~.

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Section 6 Cluster Study Process

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6.2. Scope and Purpose of Cluster Study

The Cluster Study will:

(i) evaluate the impact of all Interconnection Requests received during the Cluster Application Window for a particular year on the CAISO Controlled Grid;

(ii) identify all LDNUs and RNUs needed to address the impacts on the CAISO Controlled Grid of the Interconnection Requests, as Assigned Network Upgrades or Conditionally Assigned Network Upgrades;

(iii) preliminarily identify for each Interconnection Request required Interconnection Facilities;

(iv) assess the Point of Interconnection selected by each Interconnection Customer and potential alternatives to evaluate potential efficiencies in overall transmission upgrades costs;

(v) establish the estimated, non-binding Current Cost Responsibility, Maximum Cost Responsibility, and Maximum Cost Exposure for each Interconnection Request, until the issuance of the Interconnection Facilities Study report;

(vi) provide a cost estimate of ADNUs for each Generating Facility in a Queue Cluster Study;

(vii) identify controls required for each Interconnection Request where the Interconnection Customer requested Interconnection Service Capacity lower than the Generating Facility Capacity;

(viii) identify any Precursor Network Upgrades; and

(ix) identify RNUs as GRNUs or IRNUs.

The Cluster Study will consist of a short circuit analysis, a stability analysis to the extent the CAISO and applicable Participating TO(s) reasonably expect transient or voltage stability concerns, a power flow analysis, including off-peak analysis, and an On-Peak Deliverability Assessment, for the purpose of identifying LDNUs and estimating the cost of ADNUs, as applicable.

The Cluster Study will state for each subgroup or Interconnection Request studied individually (i) the assumptions upon which it is based, (ii) the results of the analyses, and (iii) the requirements or potential impediments to providing the requested Interconnection Service to all Interconnection Requests in a subgroup or to the Interconnection Request studied individually.

The Cluster Study will provide, without regard to the requested Commercial Operation Dates of

the Interconnection Requests, a list of RNUs, and LDNUs to the CAISO Controlled Grid that are preliminarily identified as Assigned Network Upgrades or Conditionally Assigned Network Upgrades required as a result of the Interconnection Requests in a subgroup or as a result of any Interconnection Request studied individually and Participating TO's Interconnection Facilities associated with each Interconnection Request, the estimated costs of ADNUs, if applicable, and an estimate of any other financial impacts (i.e., on Local Furnishing Bonds). For purposes of determining necessary Interconnection Facilities and Network Upgrades, the Cluster Study will consider the level of Interconnection Service Capacity requested by the Interconnection Customer, unless otherwise required to study the full Generating Facility Capacity due to safety or reliability concerns.

For purposes of determining necessary Interconnection Facilities and Network Upgrades, the Cluster Study will use operating assumptions (*i.e.*, whether the interconnecting Generating Facility will or will not charge at peak load) that reflect the proposed charging behavior of a Generating Facility that includes at least one electric storage resource as requested by the Interconnection Customer, unless the CAISO determines that Good Utility Practice, including Applicable Reliability Standards, otherwise requires the use of different operating assumptions. The CAISO may require the inclusion of control technologies sufficient to limit the operation of the Generating Facility per the operating assumptions as set forth in the Interconnection Request and to respond to dispatch instructions by the CAISO. As determined by the CAISO, the Interconnection Customer may be subject to testing and validation of those control technologies consistent with Article 6 of the LGIA and Article 2 of the SGIA.

The Cluster Study will evaluate the use of static synchronous compensators, static VAR compensators, advanced power flow control devices, transmission switching, synchronous condensers, voltage source converters, advanced conductors, and tower lifting. The CAISO and Participating TO will evaluate each identified alternative transmission technology and determine whether the above technologies should be used, consistent with Good Utility Practice, Applicable Reliability Standards, and Applicable Laws and Regulations. The CAISO and Participating TO will include an explanation of the results of the evaluation for each technology in the Cluster Study Report.

6.3 Identification of and Cost Allocation for Network Upgrades

6.3.1 Reliability Network Upgrades (RNUs).

The CAISO, in coordination with the applicable Participating TO(s), will perform short circuit and stability analyses for each Interconnection Request either individually or as part of a subgroup to preliminarily identify the RNUs needed to interconnect the Generating Facilities to the CAISO Controlled Grid. The CAISO, in coordination with the applicable Participating TO(s), shall also perform power flow analyses, under a variety of system conditions, for each Interconnection Request either individually or as part of a subgroup to identify Reliability Criteria violations, including applicable thermal overloads, that must be mitigated by RNUs.

The cost of all RNUs identified in the Cluster Study shall be estimated in accordance with Section 6.4. The estimated costs of short circuit related GRNUs identified through a subgroup shall be assigned to all Interconnection Requests in that subgroup pro rata on the basis of the short circuit duty contribution of each Generating Facility. The estimated costs of all other GRNUs identified through a subgroup shall be assigned to all Interconnection Requests in that subgroup pro rata on the basis of the maximum megawatt electrical output of each proposed new Generating Facility or the amount of megawatt increase in the generating capacity of each existing Generating Facility as listed by the Interconnection Customer in its Interconnection Request. The estimated costs of RNUs identified as a result of an Interconnection Request studied separately shall be assigned solely to that Interconnection Request. The CAISO will allocate

assigned IRNU costs proportional to the number of Interconnection Requests that have been assigned the IRNU in the current Queue Cluster. The Current Cost Responsibility will reflect the allocated costs of IRNUs.

~~Interconnection Customers assigned IRNUs in their Cluster Study will be allocated the full cost of the IRNUs in their Maximum Cost Responsibility. The Maximum Cost Exposure will include the full costs of conditionally assigned IRNUs. The Current Cost Responsibility will include their allocated share of IRNU costs.~~The Interconnection Customer's Maximum Cost Responsibility will include the full cost of Assigned Network Upgrades that are Interconnection Reliability Network Upgrades until another Interconnection Customer in the same Queue Cluster provides its payment under Article 5.6.4 of the GIA for the assigned Interconnection Reliability Network Upgrade, in which case the CAISO will reduce the Interconnection Customer's Maximum Cost Responsibility to its allocated share.

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6.6 Cluster Study Procedures

The CAISO shall coordinate the Cluster Study with applicable Participating TO(s) pursuant to Section 3.2 and any Affected System that is affected by the Interconnection Request pursuant to Section 3.7. Existing studies shall be used to the extent practicable when conducting the Cluster Study. The CAISO will coordinate Base Case development with the applicable Participating TOs to ensure the Base Cases are accurately developed. The CAISO will complete and issue to Interconnection Customers the Cluster Study report within one hundred and fifty (150) days after the ~~commencement of the Cluster Study~~close of the Customer Engagement Window; however, the Cluster Study may be completed prior to this maximum time where practicable based on factors, including, but not limited to, the number of Interconnection Requests in the Cluster Application Window, study complexity, and reasonable availability of subcontractors as provided under Section 15.2. The CAISO will share applicable study results with the applicable Participating TO(s) for review and comment and will incorporate comments into the study report. The CAISO will issue a final Cluster Study report to the Interconnection Customer.

At any time the CAISO determines that it will not meet the required time frame for completing the Cluster Study due to the large number of Interconnection Requests in the associated Cluster Application Window, study complexity, or unavailability of subcontractors on a reasonable basis to perform the study in the required time frame, the CAISO shall notify the Interconnection Customers as to the schedule status of the Cluster Study and provide an estimated completion date with an explanation of the reasons why additional time is required.

Upon request, the CAISO shall provide the Interconnection Customer all supporting documentation, workpapers and relevant pre-Interconnection Request and post-Interconnection Request power flow, short circuit and stability databases for the Cluster Study, subject to confidentiality arrangements consistent with Section 15.1.

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Section 8 Interconnection Facilities Study and TP Deliverability Allocation Processes

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8.7 Results Meeting With the CAISO and Applicable PTO(s)

Within thirty (30) calendar days of providing the final ~~Phase II~~ Interconnection Facilities Study report to the Interconnection Customer, the applicable Participating TO(s), the CAISO and the Interconnection Customer shall meet to discuss the results of the ~~Phase II~~ Interconnection Facilities Study, including selection of the final Commercial Operation Date.

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Section 11 Commercial Readiness Deposit and GIA Deposit

11.1 Types of Commercial Readiness Deposit and GIA Deposit

The Commercial Readiness Deposit and GIA Deposit posted by an Interconnection Customer may be any combination of the following types of Commercial Readiness Deposit or GIA Deposit:

(a) an irrevocable and unconditional letter of credit issued by a bank or financial institution that has a credit rating of A or better by Standard and Poors or A2 or better by Moody's;

(b) an irrevocable and unconditional surety bond issued by an insurance company that has a credit rating of A or better by Standard and Poors or A2 or better by Moody's;

(c) an unconditional and irrevocable guaranty issued by a company has a credit rating of A or better by Standard and Poors or A2 or better by Moody's;

(d) a cash deposit standing to the credit of the applicable Participating TO(s) in an interest-bearing escrow account maintained at a bank or financial institution that is reasonably acceptable to the applicable Participating TO(s);

(e) a certificate of deposit in the name of the applicable Participating TO(s) issued by a bank or financial institution that has a credit rating of A or better by Standard and Poors or A2 or better by Moody's; or

(f) a payment bond certificate in the name of the applicable Participating TO(s) issued by a bank or financial institution that has a credit rating of A or better by Standard and Poors or A2 or better by Moody's.

Commercial Readiness Deposit and GIA Deposit instruments as listed above shall be in such form as the CAISO and applicable Participating TO(s) may reasonably require from time to time by notice to Interconnection Customers or in such other form as has been evaluated and approved as reasonably acceptable by the CAISO and applicable Participating TO(s).

The CAISO shall publish and maintain standardized forms related to the types of deposits listed

above which shall be accessible on the CAISO Website. The CAISO shall require the use of standardized forms of Commercial Readiness Deposit and GIA Deposit to the greatest extent possible. If at any time the guarantor of the Commercial Readiness Deposit or GIA Deposit fails to maintain the credit rating required by this Section, the Interconnection Customer shall provide to the applicable Participating TO(s) replacement Commercial Readiness Deposit or GIA Deposit meeting the requirements of this Section within five (5) Business Days of the change in credit rating.

The ~~CAISO~~ Participating TO shall, upon receipt, deposit all Commercial Readiness Deposit, GIA Deposit, and other deposit amounts in an interest-bearing account at a bank or financial institution designated by the ~~CAISO~~Participating TO. Interest on a cash deposit standing to the credit of the applicable Participating TO(s) in an interest-bearing escrow account under subpart (d) of this Section will accrue to the Interconnection Customer's benefit and will be added to the Interconnection Customer's account on a monthly basis. Any interest earned on such amounts, based on the actual rate of the account, shall be allocated and disbursed in the same manner as the principal, in accordance with the methodology set forth in this Section 7.6

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Section 13 Generator Interconnection Agreement (GIA)

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13.3 Execution and Filing

The Interconnection Customer shall either: (i) execute the appropriate number of originals of the tendered GIA as specified in the directions provided by the CAISO and return them to the CAISO, as directed, for completion of the execution process; or (ii) request in writing that the applicable Participating TO(s) and CAISO file with FERC a GIA in unexecuted form. The GIA shall be considered executed as of the date that all three Parties have signed the GIA. As soon as practicable, but not later than ten (10) Business Days after receiving either the executed originals of the tendered GIA (if it does not conform with a FERC-approved standard form of interconnection agreement) or the request to file an unexecuted GIA, the applicable Participating TO(s) and CAISO shall file the GIA with FERC, as necessary, together with an explanation of any matters as to which the Interconnection Customer and the applicable Participating TO(s) or CAISO disagree and support for the costs that the applicable Participating TO(s) propose to charge to the Interconnection Customer under the GIA. An unexecuted GIA should contain terms and conditions deemed appropriate by the applicable Participating TO(s) and CAISO for the Interconnection Request. If the Parties agree to proceed with design, procurement, and construction of facilities and upgrades under the agreed-upon terms of the unexecuted GIA, they may proceed pending FERC action.

Simultaneously with submitting the executed GIA, or within ten (10) Business Days after the Interconnection Customer requests that the CAISO file the GIA unexecuted at FERC, the Interconnection Customer shall provide ~~the CAISO with~~ the following: (1) demonstration of continued Site Control pursuant to Section 8.1.1(2) of this RIS provided to the CAISO; and (2) the GIA Deposit provided to the Participating TO equal to twenty percent (20%) of Interconnection Customer's estimated Network Upgrade costs identified in the draft GIA minus the total amount of Commercial Readiness Deposits that Interconnection Customer has provided to the ~~CAISO~~

Participating TO for its Interconnection Request. The ~~CAISO~~ Participating TO shall use the GIA Deposit as (or as a portion of) the Interconnection Customer's security required under GIA Article 11.5. The Interconnection Customer may not request to suspend its GIA under GIA Article 5.16 until Interconnection Customer has provided (1) and (2) to the CAISO and Participating TO. If the Interconnection Customer fails to provide (1) and (2) to the CAISO and Participating TO within the thirty (30) days allowed for returning the executed GIA and appendices under RIS Section 13.1.1, or within ten (10) Business Days after the Interconnection Customer requests that the CAISO file the GIA unexecuted at FERC as allowed in this Section 13.3 of this RIS, the Interconnection Request will be deemed withdrawn pursuant to Section 3.8 of this RIS.

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