

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Borrego Solar Systems Inc.

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Docket No. ER20-1728-000

**COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”) respectfully submits comments in response to the July 2, 2020 motion for expedited action and request for remedial relief filed by Borrego Solar Systems, Inc. (“Borrego”).¹ As Borrego has explained in this proceeding, Borrego attempted to submit an interconnection request during the CAISO’s annual interconnection request window (April 1 to April 15). However, Borrego’s request still was still incomplete after the close of the window, and the CAISO tariff expressly precludes curing deficiencies after the close of the window.² Borrego requested waiver from the Commission so that it could be included in the CAISO’s 2020 interconnection study cluster. Borrego explained that its deficiencies were the result of “administrative challenges arising from COVID-19,” and that the CAISO supported its waiver request.³

The CAISO continues to support Borrego’s request; however, the CAISO respectfully requests that the Commission rule on Borrego’s request by July 24, 2020.

¹ The CAISO submits these comments pursuant to Rules 212 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.214. To the extent the CAISO requires waiver of the deadlines to file comments out-of-time, the CAISO respectfully requests waiver. Good cause exists to grant the CAISO’s request for waiver so the CAISO can provide additional information to assist the Commission in the decision-making process, and help to ensure a complete and accurate record in the case. See, e.g., *Equitrans, L.P.*, 134 FERC ¶ 61,250 at P 6 (2011); *Cal. Indep. Sys. Operator Corp.*, 132 FERC ¶ 61,023 at P 16 (2010); *Xcel Energy Servs., Inc.*, 124 FERC ¶ 61,011 at P 20 (2008).

² Section 3.5.1 of Appendix DD to the CAISO tariff.

³ *Borrego Solar Systems*, Request for Waiver at 1-2, Docket No. ER20-1728-000 (April 30, 2020).

After that date, the CAISO must exclude Borrego to begin its Phase I interconnection study for the 2020 cluster, to ensure the CAISO can maintain the study deadlines set forth in the CAISO tariff, and to avoid expending other interconnection customers' study deposits on restarting studies to include Borrego. For these reasons, the CAISO respectfully requests that the Commission issue a decision by July 24, 2020.

/s/ William H. Weaver

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Dated: July 10, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each party listed on the official service list for this proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010 (2018)).

Dated at Folsom, California on this 10th day of July, 2020.

/s/ Anna Pascuzzo

Anna Pascuzzo