



November 29, 2017

Submitted to the CAISO at initiativecomments@caiso.com by Tim Mason (Policy Director) and Susan Schneider (Consultant)

RE: LSA comments on CAISO draft Policy Initiatives Catalog

The Large-scale Solar Association (LSA) hereby submits these comments on the CAISO's November 8th draft Policy Initiatives Catalog (Catalog). LSA's comments focus on the two initiatives listed in Section 6.4 - Interconnection ("policy initiatives related to interconnection and transmission planning"), described in the Catalog as follows:

6.4.1 Interconnection Process Enhancements

LSA suggested this initiative as part of the 2017 policy initiative catalog process. This initiative would review potential enhancements to its generation interconnection process to reflect changes in the industry and to better accommodate the needs of interconnection customers. *[A list of LSA-suggested topics is then given.]*

(This appears to be the "IPE 2018" Initiative mentioned in a recent CAISO Market Notice (see below), since there is no other interconnection-related initiative in the Catalog besides the GIDAP effort described below.)

6.4.2 GIDAP and Industry Generation Procurement Solicitations Alignment Opportunities

First Solar suggested this initiative as part of the 2017 policy initiative catalog process. This initiative would examine and explore opportunities to further align the current [GIDAP] procedures with industry generation procurement solicitations. It will review the time frames projects need to compete in procurement solicitations and their need and ability to retain eligibility for transmission deliverability. It will also examine if the current 'parking' provisions that allow projects to compete for long-term utility contracts and other consumers' solicitations are reasonable.

Specifically, LSA requests the clarifications described below for these two initiatives.

Inclusion as "Submissions Incorporated" (Section 3.2): Both initiatives should be listed under "Submissions Incorporated," since they were obviously submitted, are incorporated into the Catalog, and are not listed as "Submissions Precluded" (Section 3.2). LSA asks that the CAISO list these initiatives in Section 3.2 in the final version of this period's Catalog.

Inclusion as "Initiatives Planned or Underway" (Section 5): Likewise, both initiatives should be listed under "Initiatives Planned or Underway," since they are both of these things.

IPE 2018 has a CAISO initiative Web page¹, and the CAISO has already solicited stakeholder suggestions on topics to be in-scope. The Market Notice soliciting stakeholder suggestions stated that CAISO would be "launching" this new initiative "later this year," to "evaluate potential changes needed to enhance the ISO's generator interconnection procedures and agreements." That definitive statement certainly seems to describe an initiative that should be characterized as "Planned or Underway."

¹ <http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>

Similarly, the GIDAP initiative has at least one topic in scope – examination of GIDAP “parking” provisions – that the CAISO has already committed in the current 2017 Expedited GIDAP Enhancements Initiative to exploring later. Specifically, the CAISO committed in the 2017 Expedited GIDAP Enhancements initiative to further consider parking rules in IPE 2018, as part of a comprehensive review of TP Deliverability qualification criteria generally. (See the Issue Paper and Straw Proposal.)

LSA has no objection to grouping the parking topic with the procurement-related issues raised by First Solar instead of including it in IPE 2018, since there is a clear connection between the length of time new generation projects can park (while seeking procurement contracts) and other aspects of coordination with the procurement process generally. However, the CAISO’s commitment to this element, and its inclusion in this initiative, should then qualify this initiative for listing as an initiative that is “planned or underway.”

Conclusion

LSA appreciates the CAISO’s consideration of these clarification requests and looks forward to their incorporation in the final Catalog for this period.