

151 FERC ¶ 61,124  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Norman C. Bay, Chairman;  
Philip D. Moeller, Cheryl A. LaFleur,  
Tony Clark, and Colette D. Honorable.

California Independent System  
Operator Corporation

Docket Nos. ER11-1830-000  
ER08-1317-003

ORDER ON MOTION TO ELIMINATE QUARTERLY INTERCONNECTION QUEUE  
PROGRESS REPORT

(Issued May 13, 2015)

1. On October 30, 2014, the California Independent System Operator Corporation (CAISO) filed a motion to eliminate its quarterly generator interconnection queue progress reporting obligation in the above-captioned proceedings, and, if denied, three alternative requests: (1) to include all required information in the Generator Interconnection Queue Spreadsheet posted on its website in lieu of filing a report to the Commission; (2) to reduce the report's content to only information that CAISO does not currently provide in its Generator Interconnection Queue Spreadsheet; or (3) to reduce the frequency of the report from quarterly to yearly.<sup>1</sup> As discussed below, we deny CAISO's motion to eliminate the reporting obligation completely, grant CAISO's first alternative request to include all required information in the Generator Interconnection Spreadsheet, and deny CAISO's second and third alternative requests.

**I. Background**

2. On July 28, 2008, CAISO filed its proposed Generation Interconnection Process Reform tariff amendments to improve the efficiency of its generator interconnection process. The Generation Interconnection Process Reform tariff amendments were designed to clear CAISO's interconnection backlog, allow better integration of the interconnection process in transmission planning, and included changes to CAISO's Large Generator Interconnection Procedures and Large Generator Interconnection

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<sup>1</sup> CAISO Transmittal Letter at 1-2.

Agreement.<sup>2</sup> On September 26, 2008, the Commission conditionally approved CAISO's proposed Generation Interconnection Process Reform tariff amendments.<sup>3</sup> However, concerned that lengthy delays could continue under the revised interconnection process, the Commission directed CAISO to file quarterly reports to give the Commission and other interested parties a periodic status update on the progress of the reforms.<sup>4</sup>

3. The Commission directed CAISO to include the following in its quarterly reports: (1) the number of interconnection requests filed, accepted and rejected; (2) the number and type of studies conducted, i.e., accelerated, separately studied or clustered, along with the number and types (size of project, nameplate capacity of facility, point of interconnection) of customers in each interconnection cluster; (3) any missed study deadline at each stage of the process; and (4) any withdrawals from the queue by interconnection customers and the reason for withdrawal.<sup>5</sup>

4. While CAISO had received less than 10 small generator interconnection requests prior to 2008, over 180 small generators submitted interconnection requests from 2008 until October 2010.<sup>6</sup> Thus on October 19, 2010, CAISO filed tariff revisions to its generator interconnection process, seeking to address inefficiencies in its process for small generators and to resolve the conflict between the study processes for small and large generators. CAISO explained that the proposed revisions would, in most cases, result in an integrated study process for both small and large generators. However, CAISO also proposed to establish an Independent Study Process to allow electrically

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<sup>2</sup> In this proceeding, the CAISO migrated from studying interconnection requests sequentially, wherein the results of a later-queued project are dependent on the effects on the transmission grid of earlier-queued projects, to a cluster study process in an effort to eliminate re-studies that become essential under a serial study approach.

<sup>3</sup> *Cal. Indep. Sys. Operator Corp.*, 124 FERC ¶ 61,292 (2008) (2008 order).

<sup>4</sup> *Id.* P 199.

<sup>5</sup> *Id.*

<sup>6</sup> *Cal. Indep. Sys. Operator Corp.*, 133 FERC ¶ 61,223, at P 3 (2010). CAISO stated that a primary driver in the increasing number of large and small generator interconnection requests was California's renewable energy portfolio standard, establishing a goal that at least 33 percent of California's retail load be served by renewable energy by 2020. *Id.* P 4.

isolated generators to be studied on an expedited basis separately from clustered projects, which have longer study timelines. CAISO further proposed to modify its Fast Track study process to make it a more feasible option for small generators.

5. On December 16, 2010, the Commission conditionally accepted the proposed tariff revisions and directed CAISO to include additional information in the quarterly reports required by the 2008 order.<sup>7</sup> With respect to Independent Study Process requests, the Commission directed CAISO to include: (1) the number of projects requesting interconnection through the Independent Study Process, (2) the outcome of those requests, (3) the complete length of time for recently completed Independent Study Process interconnection studies (from initial application through final approval), and (4) the reason for any rejections of projects requesting Independent Study Process treatment.<sup>8</sup> The Commission also directed CAISO to include: (1) the size and type of generator interconnection requested under the Fast Track process, (2) the proposed location of the generator, (3) the number of requests that did not pass the screens, and (4) which screens the generator developer failed.<sup>9</sup>

## II. CAISO Motions

6. In its October 20, 2014 filing, CAISO first requests that the Commission eliminate CAISO's obligation to file a quarterly interconnection queue progress report. CAISO asserts that the six years of reports are sufficient to satisfy the Commission's regulatory purpose: to make interconnection procedures more transparent and to monitor the viability of reform procedures in addressing delays.<sup>10</sup> CAISO further asserts that in light of the passage of time, the improvement in its generator interconnection process, the continued availability of the information in the public forum, and the administrative burden involved in creating the reports, good cause exists for the Commission to relieve CAISO of the requirement.<sup>11</sup>

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<sup>7</sup> See generally *id.*

<sup>8</sup> *Id.* P 97.

<sup>9</sup> *Id.* P 117.

<sup>10</sup> CAISO Filing at 7.

<sup>11</sup> CAISO Transmittal Letter at 2.

7. CAISO asserts that virtually all interconnection delays are a result of the interconnection customer's effort to secure a power purchase agreement or project financing, both of which are outside of CAISO's control. Furthermore, CAISO states that virtually all of the interconnection customers who have withdrawn from the interconnection queue have done so due to reasons such as the failure to secure a power purchase agreement, necessary siting, or licensing—all of which are contemplated by CAISO's tariff reforms.<sup>12</sup>

8. CAISO also states that the Generator Interconnection Queue Spreadsheet available on its website overlaps almost entirely with the quarterly progress reports, a factor that the Commission has previously considered in relieving the reporting burdens of other Independent System Operators and Regional Transmission Organizations.<sup>13</sup> CAISO asserts that preparing the quarterly progress reports consists almost entirely of several CAISO staff members rearranging data in the Generator Interconnection Queue Spreadsheet and putting it into a document format over several days. Therefore, CAISO asserts that eliminating the reporting requirement would allow it to more efficiently assist generator interconnection customers in its queue.

9. If the Commission denies CAISO's request to entirely eliminate the reporting requirement, CAISO offers the following alternative requests, listed in order of CAISO's descending preference: (1) to eliminate the quarterly report but require all of the information previously included to be placed in its Generator Interconnection Queue Spreadsheet on its website, (2) to reduce the report to include only that information not available in the Generator Interconnection Queue Spreadsheet, or (3) to reduce the frequency of the report to every year from every quarter.<sup>14</sup> In support of the first and second requests, CAISO notes that the only information contained in the quarterly progress reports that is not currently in in the Generator Interconnection Queue Spreadsheet is the number of requests for the fast track process that did not pass the required screens, and which screens the generators failed and the reason for any rejections of projects requesting independent study treatment.<sup>15</sup> CAISO states that it has not provided this information in the recent quarterly progress reports because there has

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<sup>12</sup> CAISO Filing at 6.

<sup>13</sup> *Id.* at 9 (citing *Devon Power LLC*, 121 FERC ¶ 61,138, at P 23 (2007)).

<sup>14</sup> CAISO Filing at 12.

<sup>15</sup> *Id.* at 10.

been no instance of denial or rejection of a generator requesting either the fast track or independent study processes.

### **III. Notice of Filing and Responsive Pleadings**

10. Notice of CAISO's filing was published in the *Federal Register*, 79 Fed. Reg. 77,468, with motions to intervene, protests and comments due on December 24, 2014. Clean Coalition filed an out-of-time motion to intervene and comments.

11. Clean Coalition (Coalition) asserts that the Commission should deny CAISO's primary request to completely eliminate the reporting requirements.<sup>16</sup> The Coalition asserts that many of the concerns that led the Commission to create the reporting requirement remain and that generators continue to face delays of up to three years from the filing of an application(s) to the execution of the interconnection agreement(s).<sup>17</sup> The Coalition also states that it is unclear what factors are causing generators to forego the available fast track procedures and continue to use CAISO's standard interconnection study processes.

12. The Coalition states that it supports CAISO's first alternative request for relief, which is to eliminate the quarterly reporting obligations but require all information included in the report to be included in the Generator Interconnection Queue Spreadsheet. The Coalition asserts that granting this request would reduce CAISO's regulatory burden while enabling the Commission to continue monitoring interconnection procedures in California.<sup>18</sup> In addition, the Coalition states that it also supports CAISO's third alternative request for relief: to reduce the frequency of reporting from quarterly to annually. The Coalition asserts that an annual report could direct the Commission to the

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<sup>16</sup> Clean Coalition Comments at 2.

<sup>17</sup> Clean Coalition Comments at 3 (citing Cal. Indep. Sys. Operator, *A streamlined process for interconnecting generating facilities*, <http://www.caiso.com/planning/Pages/GeneratorInterconnection/Default.aspx> (visited Nov. 11, 2014)).

<sup>18</sup> *Id.* at 3.

relevant online data while analyzing issues that CAISO has identified in its interconnection procedures and any actions it intends to take to address those issues.<sup>19</sup>

#### **IV. Discussion**

##### **A. Procedural Matters**

13. Pursuant to Rule 214(d) of the Commission's Rules of Practice and Procedures, 18 C.F.R. § 385.14 (2014), the Commission will grant the Coalition's late-filed motion to intervene given its interest in the proceeding, the early stage of the proceeding, and absence of undue prejudice and delay.

##### **B. Commission Determination**

14. We deny CAISO's request to eliminate the quarterly interconnection reporting requirement entirely. Since the Commission directed CAISO to submit the reports in 2008, CAISO has undertaken and is in the process of implementing several significant generator interconnection process reforms. As such, the Commission and stakeholders remain interested in having access to data that reflects the impact of these reforms on CAISO's interconnection customers at various stages in the interconnection process. Furthermore, as noted by CAISO, California's goal of 33 percent renewable energy by 2020 has contributed to the need for optimal use and efficient management of the generator interconnection queue.<sup>20</sup> For these reasons, we remain interested in monitoring the transparency and viability of CAISO's generator interconnection procedures.

15. Although we deny CAISO's request to eliminate the reporting requirement entirely, we grant CAISO's first alternative request to eliminate the quarterly report but require all information currently included in the report to be added to the Generator Interconnection Queue Spreadsheet on its website instead. We agree with CAISO and the Coalition that because of stakeholders' familiarity with the Generator Interconnection Queue Spreadsheet and CAISO's heavy reliance on it in preparing the quarterly report,

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<sup>19</sup> The Coalition asserts that CAISO's request to reduce the frequency of the reports from quarterly to annually would only be permissible if the Commission also granted CAISO's first alternative request and required it to continue publishing the current quarterly interconnection data on its website. *Id.* at 4.

<sup>20</sup> See CAISO Filing at 4, 7-8; see also *Cal. Indep. Sys. Operator Corp.*, 133 FERC ¶ 61,223, at P 67 (2010).

allowing CAISO to post in the Generator Interconnection Queue Spreadsheet all information previously reported to the Commission is a more reasonable alternative moving forward. Eliminating the report to the Commission but requiring that CAISO integrate the data into a well-known source allows CAISO to use its resources more efficiently and may increase stakeholder review and analysis of the data.<sup>21</sup> Therefore, consistent with its first alternative request, we direct CAISO, at its next scheduled update, to modify its Generator Interconnection Queue Spreadsheet prospectively to include the data and information that the Commission in 2008 and 2010 had required CAISO to report, instead of continuing to file this information with the Commission. We expect CAISO to update this information whenever it posts the most current version of the Generator Interconnection Queue Spreadsheet to its website.<sup>22</sup>

16. Because we are granting CAISO's first and preferred alternative request, we need not address the remainder of its alternative requests.

The Commission orders:

(A) CAISO's motion to eliminate the quarterly interconnection queue progress reporting requirement is hereby denied, as discussed in the body of this order.

(B) CAISO's first alternative request, to include all required information in its Generator Interconnection Queue Spreadsheet in lieu of filing a report with the Commission is hereby granted, as discussed in the body of this order.

(C) CAISO is hereby directed, at its next regularly scheduled update, to modify its Generator Interconnection Queue Spreadsheet to include the data and information

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<sup>21</sup> We note that no party to date has filed a motion or comment with the Commission after reviewing a CAISO quarterly interconnection report. *See* Docket No. ER08-1317-003.

<sup>22</sup> CAISO states that it posts an updated Generator Interconnection Queue Spreadsheet to its website every two weeks. CAISO Filing at 8.

necessitated by the quarterly interconnection queue progress reporting requirement, as discussed in the body of this order.

By the Commission.

( S E A L )

Nathaniel J. Davis, Sr.,  
Deputy Secretary.