

Summary of Cluster 15 Intake Scoring Results

June 12, 2025

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Contents

Executive Summary	3
Background information	4
Scoring of projects requesting Full Capacity Delivery Status (FCDS)	7
Commercial interest criteria and scoring7	
Project viability criteria and scoring9	
System need criteria and scoring10	
Total scores of non-merchant FCDS projects evaluated in the scoring process	
Use of Distribution Factors (DFAX) as the initial tiebreaker13	
Scoring of projects requesting Energy Only – Reimbursable status	13
Project viability criteria and scoring15	
Total scores for Energy-Only Reimbursable projects evaluated in the scoring process	
LSE-sponsored projects	19
Impact of IPE track 2 modifications	19
Next steps	20

Executive Summary

This document summarizes the cluster 15 intake scoring and ranking processes. It also provides a summary of the scores of interconnection requests submitted during the cluster 15 interconnection request resubmission window, which took place from October 1, 2024, to December 2, 2024. The intake scoring methodology was developed in the IPE 2023 track 2 stakeholder initiative, which FERC approved in its order on the ISO Tariff Appendix KK, Resource Interconnection Standards (RIS).¹

The ISO is publishing this information to provide stakeholders with data to assess the effectiveness of the interconnection request intake and scoring processes. The ISO presents this data to allow for meaningful stakeholder review while maintaining customer confidentiality.

The criteria use a weighted scoring process, multiplying the total point value from each of the three main categories by the weight to calculate the maximum points for each category. The maximum points for each category area are summed to determine the total project score used to determine the ranking among the projects competing to be included in the 150% of available capacity for the project's relevant transmission constraints.²

This report provides information on all cluster 15 projects that met the criteria to proceed to the scoring process and the points they received for the various scoring elements used to determine the total intake score for a project.

To demonstrate the impacts of the reformed process on the number of requests and the amount of capacity in the intake process, Figure 1 provides the number and capacities of projects that provided interconnection requests during the initial cluster 15 application window in 2023, the amounts that were deemed complete at the close of the cluster 15 application resubmission window in 2024, and the amounts that qualified to advance into the interconnection request validation process based on the results of the scoring and ranking process. The amounts in Figure 1 include all interconnection requests: full capacity deliverability status, merchant full capacity deliverability status, energy only reimbursable, and energy only non-reimbursable.

¹ California Independent System Operator Corp., 188 FERC ¶ 61,225 (2024).

² See Section 4 of Appendix KK to the CAISO tariff.

Figure 1. Total number and total capacity of cluster 15 interconnection requests before and after implementation of interconnection reforms

Cluster 15 Process	Number of requests	Total capacity at Plant (GW)
Initial Interconnection Requests (2023 window)	541	347
Complete Resubmissions (2025 window)	255	118
Percent Reduction: Initial to Resubmissions	53%	66%
Projects Proceeding to Validation (following project scoring and ranking)	177	96
Percent Reduction through Scoring and Ranking Processes	31%	19%

These figures do not represent total withdrawals before the commencement of cluster 15 studies because some projects withdrew during validation, and some withdrew after completing the validation process. Figure 19 provides the final number of the projects proceeding to the cluster studies.

Background information

The full scoring criteria is described in Figure 2. For most of the graphs in this report, the points shown on the x-axis are combined into groups across the potential range of available sub-points to provide a summary of the data. This ensures protection of sensitive or confidential information while providing a snapshot of the range of scores for each criterion.

Figure 2. Cluster Interconnection Request Intake Scoring Criteria

Indicators of Readiness	Sub- Points	Weight (%)	Max Points	Validation
Commercial Interest (Max points= 100) ³				
□ Load Serving Entity (LSE) allocations: Points based on the percentage of capacity allocated by LSEs to the project (e.g., a 500 MW project receiving 500 MW capacity allocation would earn 100 points for this category. A 500 MW project receiving 250 MW capacity allocation would earn 50 points for this category.) □ Check for Full Allocation Election:	100			The ISO will provide LSEs with a form to fill out to assign points to desired interconnection requests, to return to the ISO 10 calendar days after the close of the interconnection request application window. The ISO will add the points to each project's score as part of the scoring process. The ISO will provide LSEs with 21
In instances where an LSE does not have enough points to award to an entire project, each LSE may award full capacity for one project per interconnection request application window.				days for Cluster 15 allocations.
□ Non-LSE Interest: Points	25	30%	30	The ISO will provide a form requiring a signed affidavit from a representative that is authorized to execute power purchase agreements, indicating and affirming commercial interest: a. Attest non-LSE off-taker is supporting this project in support of corporate policy goals on sustainability. b. Attest that the size of application is aligned with the non-LSE off-taker needs c. Attest that non-LSE off-taker is not affiliated with the IC or its holding company d. Attest that the non-LSE off-taker has not supported more than one application.

 $^{^3}$ The total combined commercial interest scores from Load Serving Entities (LSEs) and non-LSEs can be combined for a score up to the maximum of 100 sub-points.

Summary of Cluster 15 Intake Scoring Results

Project Viability (Max points=100) ⁴					
Engineering Design Plan Completeness, with points commensurate with percent completion of engineering design plan up to a maximum of 50, to be validated based on a set of pre-determined guidelines (e.g., 15% complete=15 points) Chose no more than one of the three expansion of a	50				Signed affidavit accompanied by documentation of the project's engineering design plan level of completeness certified with a professional engineer's stamp.
generation facility items					
□ Expansion of a generation facility that is currently under construction	10	35%	35	IC submits information indicating that new IR uses same or directly adjacent site as a facility under construction	
□ Expansion of an operating facility	20	30,0		IC submits information indicating that new IR uses same or directly adjacent site as an operating facility	
□ Expansion of a facility that is under construction or in operation, where the Gen-Tie already has sufficient surplus capability to accommodate the additional resource	50			IC submits information indicating that new IR uses same or directly adjacent site as an existing facility and documents the capacity of the gen-tie, the existing (under construction or in operation) facility and the new facility	
System Need (Check one. Max points=100)					
□ Ability to provide Local Resource Adequacy (RA) in an LCRA with an ISO demonstrated need for additional capacity in that local area.	50	35%	35	The ISO will post information at least two months prior to the interconnection request window, describing the areas/sub-areas that have a deficiency of generator capacity, and the amount of additional capacity needed to eliminate the deficiency and validate IRs against that information.	
Long Lead-time Resources ☐ Meets the requirements of the CPUC and other LRA resource portfolios where the TPP has approved transmission projects to provide the necessary transmission requirements, or where transmission capacity already exists.	100			The ISO will work with the CPUC and LRAs to determine a list of eligibility requirements for this category of resources prior to the interconnection window opening.	
Total ⁵		100%	100		

Scoring of projects requesting Full Capacity Delivery Status (FCDS)

Commercial interest criteria and scoring

The total combined commercial interest scores from Load Serving Entities (LSEs) and non-LSEs can be combined for a score up to the maximum of 100 sub-points. Figure 3 shows the scores of the 171 FCDS projects entering the scoring process. Of these projects, 121 projects received no commercial interest points from LSEs and non-LSEs. Figure 4 shows the LSE commercial interest scores of all projects entering scoring process. Figure 5 provides a summary of all commercial interest points (from LSEs and non-LSEs) among all projects that requested FCDS. Of the 171 FCDS projects evaluated for scoring, 50 projects received commercial interest points from LSEs, non-LSEs, or both.

⁴ Maximum sub-points of 100 for Project Viability = Engineering Design Plan 50% complete (50 sub-points) + Expansion of an existing facility where the existing Gen-Tie already has sufficient surplus capability to accommodate the additional resource (50 sub-points)

⁵ Distribution Factor used as tiebreaker (lowest DFAX selected first), followed by auction.

Figure 3. Commercial interest points (LSE and non-LSE) of the 171 projects evaluated in the scoring process

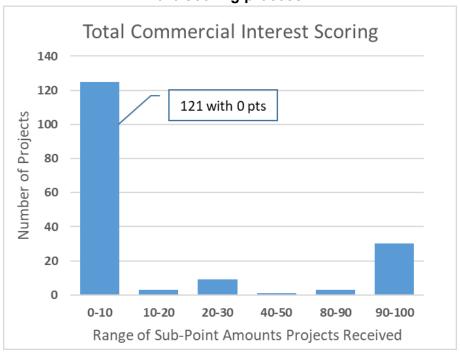
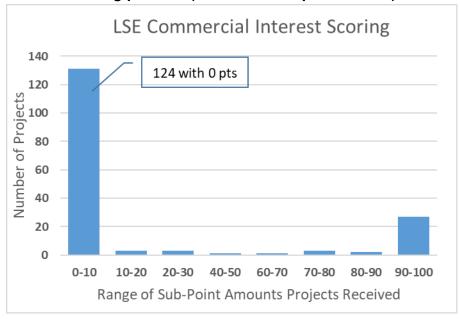


Figure 4. LSE commercial interest scores of the 171 FCDS projects evaluated in the scoring process (Maximum sub-points = 100)



Eligible non-LSE commercial interest score consists of a singe 25 sub-point value. Of a total of 171 FCDS projects evaluated in the scoring process, ten projects received non-LSE points and 161 did not.

Figure 5. Summary of commercial interest (CI) scores of the 171 FCDS projects evaluated in the scoring process

	Received LSE Sub-points	Received Non-LSE Sub-Points	Received Commercial Interest Points
Total No. of FCDS Projects Receiving CI Points	47	10 ¹	50 ²
Percent of All FCDS Projects Receiving CI Points	27%	6%	29%
No. of Projects Receiving CI Points Advancing	43	8	46
Percent of those Receiving CI Points Advancing	91%	80%	92%
Percent of All FCDS Projects Advancing	25%	5%	27%
Percent of FCDS Projects with CI Points not Advancing	2%	1%	2%

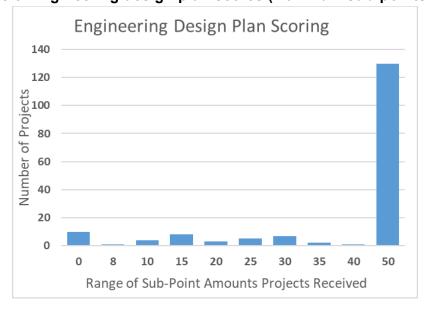
Also the total number of non-LSEs providing points to a project.

Project viability criteria and scoring

Engineering Design Plan

Of the 171 FCDS projects evaluated in the scoring process, 130 projects received the maximum of 50 sub-points for having an engineering design plan that was at least 50% complete. The engineering design plan scores of the 171 projects evaluated in the scoring process are shown in Figure 6.

Figure 6. Engineering design plan scores (maximum sub-points = 50)

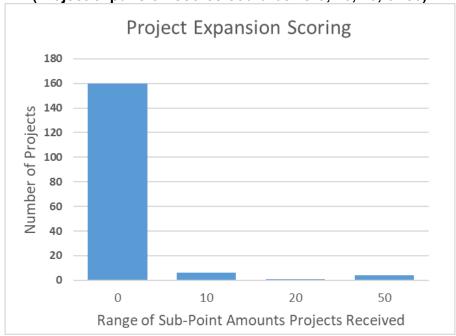


² Seven of the 50 received points from both an LSE and a non-LSE.

Project Expansions

Eleven of the 171 projects evaluated in the scoring process had any points for project expansion, as shown in Figure 7.

Figure 7. Project expansion scores of the 171 projects evaluated in the scoring process (Project expansion scores could be zero, 10, 20, or 50)



System need criteria and scoring

Local resource adequacy

System need sub-points for Local Resource Adequacy are either zero or 50.

- Eight out of 171 of the projects evaluated in the scoring process qualified for the Local Resource Adequacy in an area with an ISO demonstrated need for additional capacity.
- No cluster 15 projects met the requirements of the CPUC and other LRA
 resource portfolios where the TPP has approved transmission projects to provide
 the necessary transmission requirements, or where transmission capacity
 already exists.

Total scores of non-merchant FCDS projects evaluated in the scoring process

Figure 8 provides the total scores for all 171 non-merchant FCDS projects evaluated in the scoring process. The total score is the sum of the weighted sub-points from each scoring category.

Figure 8. Total points for all 171 FCDS projects evaluated in the scoring process, based on overall project score

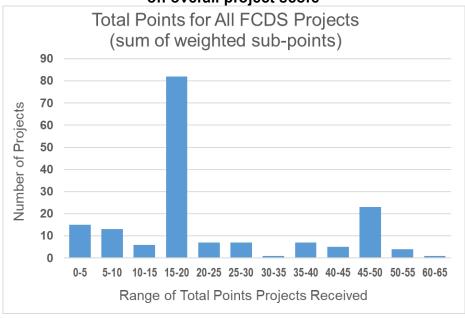


Figure 9 provides the total scores for all 171 non-merchant FCDS projects evaluated in the scoring process, separated into those projects that passed and those that failed. Pass designates projects whose score ranked high enough to be included in the 150% capacity limit and progressed to the validation process. Fail designates projects whose score was not high enough and were withdrawn. The total score is the sum of the weighted sub-points from each scoring category.

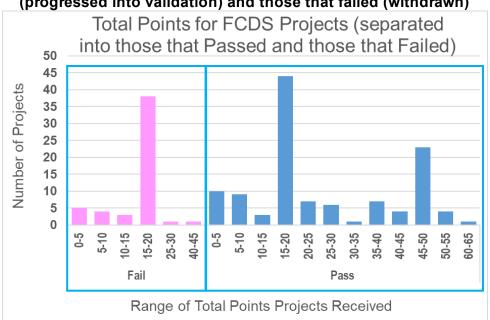
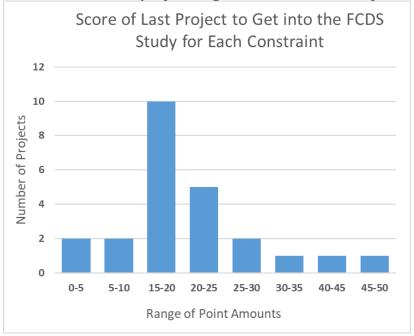


Figure 9. Total points for all 171 FCDS projects separated into those that passed (progressed into validation) and those that failed (withdrawn)

Figure 10, below, shows the lowest clearing score to provide stakeholders with information on the range of scores that allowed individual projects to advance to the validation in each area. The figure shows the scores of the last FCDS project to advance to validation based on remaining available capacity within the 150% capacity limit. These projects had the lowest score at the constraint before either hitting or exceeding the capacity limit.

Figure 10. Scores of the last FCDS project to get into the FCDS study for each constraint

Score of Last Project to Get into the FCDS



Use of Distribution Factors (DFAX)⁶ as the initial tiebreaker

In instances of tied scores among interconnection requests, the ISO uses DFAX analysis as the first tiebreaker. If ties still exist and multiple projects have the same DFAX, the ISO uses a sealed-bid market clearing auction process as the second and final tiebreaker.

In three cases in cluster 15, the next highest score for inclusion within a given constraint's 150% capacity limit⁷ was held by a number of projects having the same score. In such cases, the DFAX tiebreaker methodology was used, where the project with the lowest DFAX was selected as the project to move forward. The use of the DFAX as a tiebreaker resulted in no auctions being required as a final tiebreaker.

Scoring of projects requesting Energy Only – Reimbursable status

Fifty-Nine resubmitted Energy Only projects were deemed complete, advancing to the scoring and ranking process. Of those 59 projects, 39 did not receive any commercial interest points.

Eligible non-LSE commercial interest score consists of a singe 25 sub-point value. Of a total of 59 Energy Only projects, two projects received non-LSE points and 57 did not.

Figure 11 shows overall commercial interest scores among complete Energy Only projects, while Figure 12 shows only the commercial interest points awarded by LSEs to projects requesting Energy Only status. Figure 13 provides information on commercial interest of Energy Only projects evaluated in the scoring process.

⁶ DFAX is a measure of the impact of injections of energy from a generator at a particular location, which could result in required network changes on the grid. Projects were selected in order of the lowest DFAX with the selection process ending with the project that caused the 150% threshold to be exceeded, regardless of the size of the last project.

Where all of the next projects under consideration either hit or exceed the 150% capacity limit.

Figure 11. Total combined commercial interest scores (LSEs and non-LSEs) for Energy Only Projects. (Maximum = 100 sub-points)

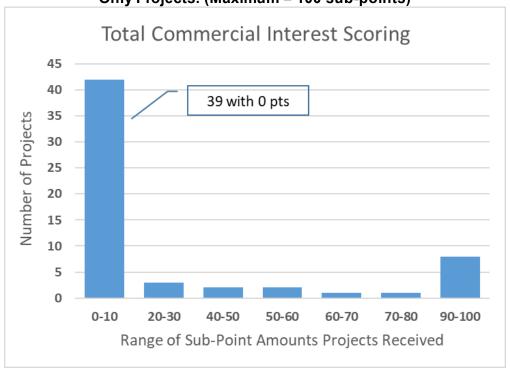


Figure 12. LSE interest scoring (maximum score = 100) LSE Commercial Interest Scoring 50 45 40 40 with 0 pts Number of Projects 35 30 25 20 15 10 5 0 0-10 20-30 40-50 50-60 60-70 70-80 90-100 Range of Sub-Point Amounts Projects Received

Figure 13, below, shows of the 59 Energy Only (EO) projects requesting reimbursable status, 16 projects received commercial interest (CI) points, and provides information on the ability of those projects to advance to the validation process. Of a total of 59 EO projects, two projects receive non-LSE points and 57 did not.

Figure 13. Commercial interest summary for projects requesting Energy Only - Reimbursable status

	Received LSE Sub-points	Received Non-LSE Sub-Points	Received Commercial Interest Points	
Total No. of EO Projects Receiving CI Points	19	2 ¹	20 ²	
Percent of All EO Projects Receiving CI Points	32%	3%	34%	
No. of Projects Receiving CI Points Advancing	16	1	16	
Percent of those Receiving CI Points Advancing	84%	50%	80%	
Percent of All EO Projects Advancing	27%	2%	27%	
Percent of EO Projects with CI Points not Advancing	5%	2%	7%	
¹ Also the total number of non-LSEs providing points to a project.				

² One of the 20 received points from both an LSE and a non-LSE.

Project viability criteria and scoring

Engineering Design Plan

Of the 59 Energy Only projects evaluated in the scoring process, 39 projects received the maximum of 50 sub-points for having an engineering design plan that was at least 50% complete, as shown in Figure 14.

Engineering Design Plan Scoring

45

40

35

30

25

20

10

5

0

20

Range of Sub-Point Amounts Projects Received

Figure 14. Engineering design scores of the 59 Energy Only projects evaluated in the scoring process (Maximum score = 50)

Project expansions

Of the 59 Energy Only projects evaluated in the scoring process, over 50 projects did not receive any points for project expansions, as shown in Figure 15.

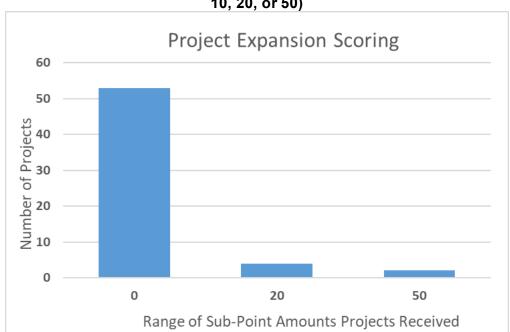


Figure 15. Project expansion scoring for Energy-Only Projects (Possible scores are zero, 10, 20, or 50)

Total scores for Energy-Only Reimbursable projects evaluated in the scoring process

Figure 16 shows overall scores of the 59 Energy Only projects seeking reimbursement that were evaluated in the scoring process. The total score is the sum of the weighted sub-points from each scoring category.

Figure 16. Total Points for the Energy Only projects based on the sum of the weighted sub-points for each project

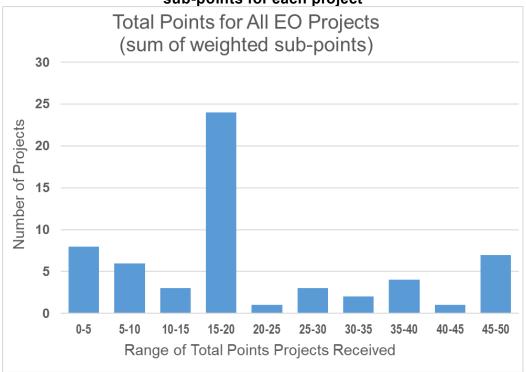


Figure 17 provides the total scores for the 59 Energy Only projects seeking reimbursement, separated into those that projects that passed and those that failed. Pass designates projects whose score ranked high enough to be included in the 150% capacity limit for each CPUC portfolio zone and progressed to the validation process. Fail designates projects whose score was not high enough and were withdrawn. The total score is the sum of the weighted sub-points from each scoring category.

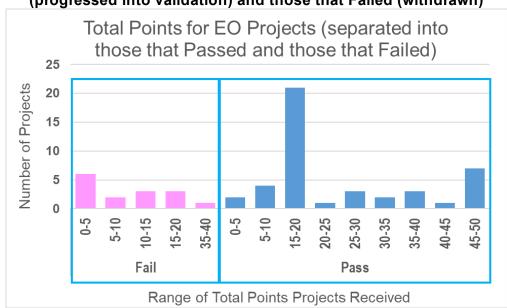
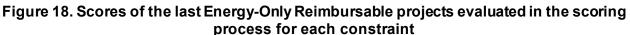
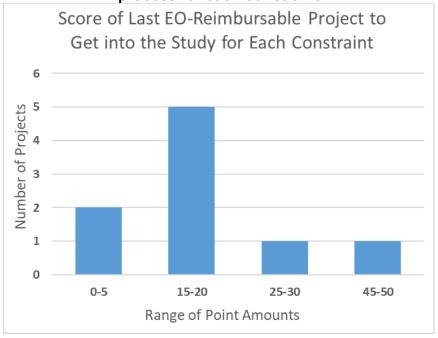


Figure 17. Total points for the 59 Energy Only projects separated into those that Passed (progressed into validation) and those that Failed (withdrawn)

Figure 18 shows the scores of the last projects to get into the studies as Energy Only for each CPUC portfolio zone, based on remaining available capacity within the portfolio zone's 150% capacity limit. These projects either hit or exceeded the capacity limit at the zone.





LSE-sponsored projects

Only one LSE submitted interconnection requests for projects seeking FCDS in a zone with available deliverability capacity. That LSE submitted three projects seeking FCDS, and gave commercial interest points to only one of the three projects, in an amount that was less than their 25% limit.⁸ The same LSE allocated the rest of its points to third-party projects. No LSEs submitted interconnection requests for Energy Only projects.

Impact of IPE track 2 modifications

Figure 19, below, demonstrates the impact of the reformed ISO interconnection request intake process on the number of interconnection requests in cluster 15. The number of applications and the total requested capacity in the cluster 15 interconnection request resubmission window were reduced to more manageable levels in two phases: the decision to re-submit interconnection requests under the new reformed process (including Order No. 2023 requirements) and the scoring and ranking of projects to determine which projects would fit into 150% capacity limit of each constraint for FCDS projects, or each zone for the energy only projects. The objective of this scoring process was to reduce the study volumes to more manageable levels and to advance the most viable projects through the queue.

⁸ As noted in the final proposal, the ISO's intent with the proposed limitation of three projects or 25% of an LSE's allocation per cluster was to ensure continued, healthy levels of competition and to maintain historical trends regarding LSE-owned projects in the queue. The ISO's intent is neither to create new incentives for LSE-ownership, nor disrupt utility ownership.

The number of projects proceeding to studies shown in Figure 19 reflect all withdrawals before the commencement of cluster 15 studies, including projects that withdrew during validation as well as withdrawals after completing the validation process.

Figure 19. Total number and total capacity of cluster 15 interconnection requests before

and after implementation of interconnection reforms

Cluster 15 Process	Number of requests	Total Plant Capability (GW)
Initial Interconnection Requests (2023 window)	541	347
Resubmissions (2025 window)	255	118
Percent Reduction: Initial to Resubmissions	53%	66%
Projects proceeding to validation (following project scoring and ranking)	177	96
Projects proceeding to studies (includes project withdrawals prior to the start of studies)	145	68
Percent Reduction: Resubmission to Study	43%	42%
Precent reduction OVERALL	73%	80%

Next steps

Based on the information provided in Figures 1-19, the ISO believes that the current scoring process used for cluster 15 is adequate, with no adjustments necessary for continued use for clusters 16 and beyond. The scoring process provided sufficient differentiation in scoring between projects within cluster 15. The ISO does not see the need for adjustments to the scoring process for cluster 16, but will continue to monitor future scoring results and will propose modifications to the scoring methodology if changes are warranted in the future. In addition, recognizing that stakeholders will likely have questions about this report, the ISO will schedule a stakeholder call to discuss the findings.

The ISO has committed to review several other elements of the interconnection request intake process and the need for any modifications in the next Interconnection Process Enhancements (IPE) initiative. The data presented above does not suggest to the ISO the need for significant changes to the scoring criteria; however, the ISO understands that stakeholders have sought clarity and consideration of several factors of the

Summary of Cluster 15 Intake Scoring Results

interconnection request intake process. To that end, the ISO will release a scoping document for the next IPE initiative in July, and will seek stakeholder comment on that scoping document prior to releasing the straw proposal for the next IPE initiative, which will begin by August of 2025.