

## Stakeholder Comments on CAISO PRR 1309

Submitted by	Organization	Date Submitted
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### EDF-Renewables Comments on CAISO PRR 1309

EDF-Renewables respectfully submits the following comments on CAISO's PRR 1309 "Clarification on point of interconnection changes, independent study process eligibility, interconnection financial security refunds, and allowable actions when projects are parked."

#### Section 6.2.2 – use of the word “may” implies flexibility

The changes in section 6.2.2 seem to be reasonable. EDF-Renewables requests CAISO provide the citations or rework the language to make it clear where the BPM language is guidance and where it is a tariff driven rule.

**CAISO PRR as Guidance:** *“Should the proposed Point of Interconnection be determined to be infeasible, the Interconnection Customer may look at alternative Points of Interconnection near the original proposed request, for example, within the same county, one transmission line, or one switchyard from the original.”*

--or--

**CAISO PRR as Tariff Rule:** *“Should the proposed Point of Interconnection be determined to be infeasible, the Interconnection Customer may look at alternative Points of Interconnection. Alternative Points of Interconnection must be within the same county, one transmission line, or one switchyard from the original. <sup>1</sup>[Tariff Appendix DD section #####]”*

#### Section 6.3.1.3

EDF-Renewables requests clarification on why CAISO's new language is placed in Section 6.3.1.3 "Electrical Independence" heading and not with similar information in the second and third paragraphs of Section 6.3. EDF-Renewables recommends the language remain in Section 3 and be placed under its own heading "Application Timing and its Effect on Future Options."

EDF-Renewables appreciates the example timelines. They are a very valuable aid to understanding. Application timelines and outcomes should contain sufficient detail to ensure they are well understood by customers and applied uniformly across all projects and PTO regions. Appendix DD section 3.5.2 provides sufficient detail down to the business day for the IR validation process and exceptions. EDF-Renewables requests CAISO rework the scenarios to include that granularity and identify a "reasonable" calendar date that ICs can submit their ISP requests before to ensure consideration in the upcoming cluster in the event their ISP fails.

In Scenario 2 below CAISO implies the IR would not be eligible to transition to the next cluster because it was not yet validated, but CAISO and PTO share two-thirds responsibility for the time it takes to complete the IR review process. EDF-Renewables also requests CAISO include in the BPM language reference to Appendix DD Section 3.5.3 which allows for day-for-day extension if CAISO or PTO fail to meet a deadline.

Please refer to Exhibit A as an example, which employs the following constants based on Tariff Appendix DD section 3.5.2 and 3.5.3:

- CAISO and PTO have 10 BD to review an IR
- Cluster applications must be deemed valid by June 30

*((NEW)) Section 6.3.1 "Application Timing and its Effect on Future Options."*

*An Interconnection Request may be submitted for the ISP at any time. However, ~~even~~ an Interconnection Customer may find it advantageous to submit its Interconnection Request for the ISP as early as possible before a Cluster Application Window closes, in order to receive a determination regarding independence before the window closes, in case the project fails to qualify for the ISP and wishes to participate in the Cluster Study Process and, therefore, minimize the wait time before the next open Cluster Application Window.*

*If an Interconnection Customer submits an Interconnection Request during a new open Cluster Application Window period and later chooses to switch to the ISP, then that customer will have to wait for the studies of the recently closed Cluster Application Window to be far enough along in order to determine the proposed Generating Facility's electrical independence against the projects in that latest cluster. In the event the CAISO or PTO fail to meet a deadline, the Interconnection Customer will be entitled to a day for day extension to timelines consistent with Appendix DD Section 3.5.3.*

**Commented [RQ1]:** This language currently exists in Section 6.3

*~~Although an ISP project can be submitted at any time, the ISP project may not necessarily be included in the next cluster window should it fail the electrical independence test. If the Interconnection Customer wishes to have the option of the project being included in the next cluster window, the Interconnection Customer should allow sufficient time for the ISP to be validated prior to the closing of the next cluster window and to determine the result of the project's electrical independence test.~~*

Scenario 1:

November- IR submitted

December- IR validated

January-Fails screens

IR may enter into the next cluster window opening April 1 and closing April 15

Scenario 2:

February/March-IR submitted

IR must be validated before the closing of the cluster window on April 15

Scenario 3:

May - IR submitted

June - IR validated

July - Fails independence test

IR may enter into the next year cluster window.

**Commented [RQ2]:** Rework examples with more granularity. Please see attached table for suggestion.

**Exhibit A - EDF-Renewables Comments on CAISO PRR 1309**

	Cluster Scenario 1	Cluster Scenario 2	ISP Scenario 1	ISP Scenario 2	ISP Scenario 3	ISP Scenario 4	ISP Scenario 4
IR Submitted	4/15/2021	4/15/2021	11/6/2020	3/31/2021	5/6/2021	2/15/2021	2/15/2021
IR Results back to IC (10 BD)	4/29/2021	4/29/2021	11/20/2020	4/14/2021	5/20/2021	3/1/2021	3/1/2021
IR Resubmitted (assumed 10 BD, can be ASAP)	5/13/2021	5/13/2021	12/4/2020	↓	6/3/2021	3/15/2021	3/15/2021
IR Results back to IC (10 BD)	5/27/2021	5/27/2021	12/18/2020	↓	6/17/2021	3/29/2021 = IR VALID	3/29/2021
IR Resubmitted (assumed 10 BD, can be ASAP)	6/10/2021	6/10/2021	1/1/2021	↓	7/1/2021	↓	4/12/2021
IR Results back to IC (10 BD)	6/24/2021 = IR VALID	6/24/2021	1/15/2021	↓	7/15/2021 = IR VALID	↓	4/26/2021 = IR VALID
IR Resubmitted (assumed 10 BD, can be ASAP)	↓	7/1/2021	1/29/2021	↓	↓	↓	↓
IR Results back to IC (10 BD)	↓	IR INVALID	2/12/2021 = IR VALID	↓	↓	↓	↓
ISP Screen Results = FAIL	n/a	n/a	n/a	n/a	FAIL	FAIL	FAIL
<b>Result</b>	Accepted in Cluster 14	IR was not accepted because time ran out. IR can seek interconnection in Cluster 15.	IR deemed invalid before cluster window application closed. IR can be transferred to Cluster 14 (Year 2021)	IR cannot be deemed valid or invalid before cluster window application closed. If it is ultimately invalid or fails screens, IR can be transferred to Cluster opening April 1, 2022	IR can be transferred to Cluster opening April 1, 2022	IR deemed valid before cluster window application closed but ultimately failed screens. IR can be transferred to Cluster 14.	IR deemed valid after cluster window application closed but ultimately failed screens. IR can be transferred to Cluster opening April 1, 2022.
<b>Cluster Eligibility</b>	Cluster 14 (Year 2021)	Cluster 15 (Year 2022)	Cluster 14 (Year 2021)	Cluster 15 (Year 2022)	Cluster 15 (Year 2022)	Cluster 14 (Year 2021)	Cluster 15 (Year 2022)

Excel file also uploaded to BPM management tool to provide CAISO visibility on excel formulas used and ability to edit.