



GOLDEN STATE CLEAN ENERGY

RE: Golden State Clean Energy, LLC initial comment on GIDAP BPM PRR 1543

Golden State Clean Energy, LLC (“GSCE”) requests additional information regarding what informed the acreage reasonably necessary for generation interconnection, as provided in CAISO’s proposed revisions to GIDAP BPM Section 5.4.3.1. GSCE believes 3 acres/MW PV is unreasonably low (i.e., requires too little land) for many solar projects, especially projects involving a tracking system. Fixed-tilt projects may require less land and thus render 3 acres/MW PV more reasonable, but a project involving a tracker is more likely to be in the range of 6-7 acres/MW PV. In fact, the CPUC assumes 10 acres/MV PV in its IRP portfolio development process,¹ although GSCE submitted informal comments on August 4, 2023, pushing back on this and recommending 6.5-7 acres/MW PV. If CAISO’s proposal is in recognition of fixed-tilt projects requiring less land than tracker projects, GSCE requests CAISO differentiate fixed-tilt versus tracker projects in Section 5.4.3.1 because of the meaningful distinction in the acreage required to provide site exclusivity. If the requirement stands as proposed and interconnection customers only need to demonstrate site control for as little as half of the actual land needed for their project, CAISO will severely undercut the new FERC Order 2023 requirement to secure land before submitting an interconnection request.

GSCE also requests CAISO distinguish different energy storage technologies. Currently it appears that only battery storage is contemplated (and we recommend BESS be spelled out for clarity so it is not assumed to stand for all storage resources). Although battery storage is by far the most common energy storage technology seeking interconnection, non-battery energy storage resources are advancing and need to be considered. For instance, certain long-duration energy storage resources such as compressed air may require much more land for project development than battery storage and thus needs to be distinguished.

Dated: January 19, 2024

/s/ Ian Kearney

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¹ CPUC Energy Division, *Methodology for Resource-to-Busbar Mapping for the Annual TPP*, Oct. 2023, pg. 14: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/2022-irp-cycle-events-and-materials/2023-2024-tpp-portfolios-and-modeling-assumptions/mapping_methodology_v10_05_23_ruling.pdf.