**Terra-Gen, LLC comments on PRR 1543 – GIDAP BPM Site Exclusivity Revisions – January 19, 2024**

Terra-Gen, LLC (Terra-Gen) appreciates the opportunity to comment on CAISO’s PRR 1543. Under PRR 1543 CAISO seeks modifications to clarify Site Exclusivity demonstrations. Terra-Gen provides related recommendations to modify the CAISO’s proposed Site Exclusivity “Acreage Reasonable Necessary” table and overall percentage for site control demonstration requirements as explained below.

Terra-Gen recommends that CAISO require 100% of the acreage reasonably necessary to accommodate the Generating Facility instead of the current 50% requirement that CAISO has not proposed to change in its BPM redlines. Terra-Gen notes that, at minimum, CAISO should require at least 90% of the specified Acreage to demonstrate stie control. This change aligns with FERC’s Order 2023 requirement for 90% site control demonstration.

Regarding specific technology type acreage requirements, Terra-Gen recommends the following changes: For Solar PV the CAISO should require 6 acres per MW, not the proposed 3 acres per MW. For BESS the CAISO should require 0.05 acres per MW, not the proposed 0.1 acres per MW. Terra-Gen provides the following example data of existing projects in the CAISO footprint that supports these recommendations:

* Solar unit 1: 6.27 acres/MW
* BESS unit 1: 0.06 acres/MW
* BESS unit 2: 0.06 acres/MW
* BESS unit 3: 0.04 acres/MW
* BESS unit 4: 0.05 acres/MW