

BACKGROUND

Here is the proposed PRR language (bpmcm.caiso.com [bpmcm.caiso.com]):

5.4.3.1 General (What is Site Exclusivity?)

Site Exclusivity is defined in CAISO Tariff Appendix A as documentation reasonably demonstrating:

- For private sites;
 - Ownership of, a leasehold interest in, or a right to develop property upon which the Generating Facility will be located consisting of a minimum of 50% of the acreage reasonably necessary to accommodate the Generating Facility based on the table below; or
 - An option to purchase or acquire a leasehold interest in property upon which the Generating Facility will be located consisting of a minimum of 50% of the acreage reasonably necessary to accommodate the Generating Facility based on the table below.

<u>Acreage Reasonably Necessary</u>							
<u>Technology</u>	<u>Solar PV</u>	<u>Solar CSP</u>	<u>Wind</u>	<u>Biomass</u>	<u>BESS*</u>	<u>Combustion Turbine</u>	<u>Hydro</u>
<u>Minimum Acres/MW</u>	<u>3</u>	<u>9</u>	<u>30</u>	<u>3</u>	<u>0.1</u>	<u>3</u>	<u>10</u>

*smaller BESS land requirements will be considered with proper documentation of project configuration

CAISO response to comments (verbatim – cut and paste)

BPM PRR Submitter: Wilson, Daune (CAISO)

Modified BPM language proposed by the PBM Change Management Coordinator

Approve the BPM PRR as modified. Recommendation based on the PRR as modified by initial comments received and further CAISO development.

A 2022 Berkley study showed 94% of utility scale pv uses at least a single axis tracking system, therefore the CAISO modified to 6MW per acre for solar. The CAISO does not collect details on fixed tilt vs tracking at the time of IR submission.

Upon reviewing more data, .06mw per acre is reasonable for BESS Storage. The guidelines provided cover all types of generation currently in the queue and as new technology emerges The CAISO reevaluate.

Should a project far enough along to submit an IR for a generation type not currently listed, they will need to provide documentation showing the project has acquired sufficient space as would any project suggesting they need less than what is listed in the Acreage Reasonably Necessary table in the GIDAP BPM.

PROPOSED COMMENTS

LSA’s comments focus on the amount of land shown for solar projects.

The amount of land shown be: (1) not too high, which could screen out viable projects; or (2) not too low, to screen out non-viable projects and disadvantage viable ones.

LSA agrees with earlier stakeholder comments that the 3 acres/MW figure is too low, and that a figure closer to 6 acres/MW is more reasonable. However, LSA believes that it is feasible in some situations to build a project with less land (e.g., 5 acres/MW), and technology continues to improve.

Thus, LSA suggests expanding the exception language in the table footnote to include solar technologies as well, as shown below. (LSA accepted the CAISO’s changes and shows only its recommended changes.)

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Acreage Reasonably Necessary							
Technology	Solar PV*	Solar CSP	Wind	Biomass	BESS**	Combustion Turbine	Hydro
Minimum Acres/MW	36	9	30	3	0.1	3	10

* Smaller Solar PV land requirements will be considered with proper documentation of project configuration and technology.

**sSmaller BESS land requirements will be considered with proper documentation of project configuration