

**PRR 1543**  
**COMMENTS FROM LARGE-SCALE SOLAR ASSOCIATION**

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.)

**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.

Acreage Reasonably Necessary							
Technology	Solar PV*	Solar CSP	Wind	Biomass	BESS**	Combustion Turbine	Hydro
Minimum Acres/MW	<u>36</u>	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