**AES Comments on CAISO PRR 1605 – Implementation of IPE Track 2**

AES Clean Energy, “AES,” appreciates the opportunity to submit comments on the PRR 1605. AES provides brief comments on the proposed BPM changes that mainly seek clarification.

AES seeks clarification on the proposed changes for Section 6.1.5.2, Commercial Viability Criteria – one year exception rule. This section was noted to include changes in the Revision History table, but it does not appear to have redlines in Section 6.1.5.2.

AES notes that the proposed Construction Sequencing redlines do not fully reflect the Final Interconnection Process Enhancements Proposal. The Final Proposal states, “The ISO proposes to update the BPM for Generator Management (Section 6.2.1.4) to specify that projects must have started construction and be within nine months of achieving their then-current synchronization or commercial operation date to submit a construction sequencing delay request. If updates to the COD are necessary beyond nine months, a modification request must be submitted.” The current redlines do not include language that specifies the requirement to be within nine months of achieving synchronization or COD. In addition, CAISO should add language to help support a customer’s desire to accelerate its project COD.

AES appreciates the CAISO’s clarification on the discussed topics.

Respectfully submitted,

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