**PRR 1605**

**BPM FOR GENERATOR MANAGEMENT CHANGES, 2023 IPE TRACK 2**

**LSA COMMENTS (green highlight)**

**6.2.1.4 Construction Sequencing**

If the COD of a proposed Generating Facility requires a change by up to 6 months, then the requested change in dates for the In-Service Date, Initial Synchronization Date, and COD may be requested and approved without going through the MMA process. Interconnection Customers with executed GIAs, where the Generating Facility has commenced construction, and is within six (6) months of the then-current Initial Synchronization Date or COD may exercise the construction sequencing request for up to a cumulative six (6) months before triggering the need for an MMA. . If a COD needs to be extended because both Network Upgrades are delayed, and because of a construction sequencing issue, the Network Upgrade delay will be considered first, and then the clock will start on 6 months of allowable construction sequencing.

**6.4.4** **Timeline**

The modification assessment will not commence until a completed modification request (including all of the necessary technical documents) has been deemed valid and data complete by the CAISO and the Interconnection Customer’s modification assessment deposit have been received. Each modification assessment will be completed, and a response will be provided to the Interconnection Customer in writing, within 60 calendar days after the CAISO receives a completed modification request and modification assessment deposit, unless the modification request is submitted during the Reassessment process, the Phase I or Phase II study or any other exception provided for under the Tariff (see BPM Section 6.1.1 above). If the modification request results in a change to the Interconnection Facilities or Network Upgrades, the modification assessment could take up to one hundred and twenty (120) calendar days. If the modification assessment cannot be completed within that time period, the CAISO shall notify the Interconnection Customer and provide an estimated completion date with an explanation of the reasons why additional time is required.

The CAISO and/or Participating TO shall provide a list of all identified technical deficiencies within 10 calendar days. If an interconnection customer does not respond to an interconnection request package deficiency request or otherwise-related modification communication within 30 calendar days, the CAISO may cancel the request and will then refund any unused portion of the deposit. If this occurs, the Interconnection Customers must resubmit a new modification request and deposit to restart the process.

**6.5.4 Deliverability Transfer**

Deliverability for Resource Adequacy purposes may not be assigned or otherwise transferred except as expressly provided by the CAISO Tariff. An Interconnection Customer may reallocate its Generating Facility’s Deliverability to another Generating Facility that has a point of interconnection at the same substation/switchyard and at the same voltage level. The Generating Facility’s aggregate output as evaluated in the Deliverability Assessment cannot increase as the result of any transfer, but may decrease based on the assignee’s Generating Unit characteristics and capacity. The CAISO will inform the Interconnection Customer of each Generating Unit’s Deliverability Status and associated capacity as the result of any transfer. The results will be based on the current Deliverability Assessment methodology.

Deliverability transfer may be requested through a deliverability transfer request, as part of a modification request, or as a part of a repowering request. For example, an Interconnection Customer could request that deliverability be transferred from the original solar photovoltaic Generating Facility to an energy storage Generating Facility when requesting modification to add energy storage component to the solar PV generation project. Alternatively, the Interconnection Customer could first request a modification to add an energy storage Generating Facility, and request a deliverability transfer after the approval of the modification.

The Generating Facility receiving TPD transfers are subject to the same tariff requirements, obligations, limitations, and required timelines, as applicable, as the project that received the original TPD allocation. In other words, TPD transfers may not be used to circumvent existing tariff requirements. Two examples that highlight potential situations:

1. Project A requested and received FCDS via a Group Three (3) TPD request. Project A wants to transfer its TPD to Project B, a later queued project. Since Group 3 is prohibited from extending its COD except under certain circumstances (otherwise it is converted to Energy Only deliverability status), Project B must have the same or an earlier COD as Project A and cannot extend that COD unless aligning the COD with the COD in a subsequently executed power purchase agreement (PPA), or if Participating TO construction of needed upgrades is subsequently delayed.

1. If Project A requested and received FCDS via Group Three (3), and then requested a COD extension to align with the COD in an executed PPA, and a subsequent PTO extension is necessary, the COD would be based on the PTO extension date if it is later than the date indicated in the executed PPA. Due to the initial request to align the project COD with the COD in an executed PPA, if Project A requests to transfer TPD to Project B, Project B must also have an executed PPA.
2. If Project A requested and received FCDS via Group D, retained that TPD allocation in the next cycle via demonstration of a PPA shortlist position, and then requested a TPD Transfer to Project B, Project B must comply with the Group D retention requirements, i.e., must demonstrate an executed PPA by the next TPD allocation affidavit submittal deadline.

Additionally, unless the Interconnection Customer provides the CAISO with an executed Energy Only power purchase agreement for the capacity transferring Deliverability at the time it requests the Deliverability transfer, the resulting Energy Only capacity must be removed from queue by withdrawal or downsizing the Generating Facility.