

EDFps Comments on PRR 1695

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EDF power solutions thanks the CAISO for the opportunity to comment and for the considerable time, care, and effort staff have devoted to the IPE 5.0 initiative. We appreciate the sustained engagement throughout this lengthy and complex process, including the work to translate the policy outcomes into clear implementation guidance. We welcome the opportunity to continue collaborating with CAISO and stakeholders as this important initiative moves toward completion and offer the comments below in that spirit.

We respectfully offer the following requests to help ensure that the BPM clearly reflects the approved tariff and provides consistent instructions to interconnection customers.

1. Improper Cumulative Impacts of Two BPM Sections

EDFps believes that the combination of two BPM sections has the potential to unintentionally and improperly require a 40% forfeiture of Network Upgrade costs where the guidance of FERC Order 2023 is a 20% deposit.

Specifically:

- Section 46.2(4) provides that the GIA Deposit and subsequent financial security “shall be forfeited,” separately from and in addition to the withdrawal penalty.
- Section 56 similarly describes forfeiture of the entire GIA Deposit plus withdrawal penalties for the circumstances addressed there.
- Section 52.4 of the Draft BPM requires customers to maintain Commercial Readiness Deposits equal to 20% of estimated Network Upgrade costs “separate from and in addition to” the GIA Deposit. It also restricts the use of those Commercial Readiness Deposits for construction funding.

However, we do not see requirement in CAISO tariff language here to maintain an additional, separate 20% withdrawal-security reserve. Specifically, Appendix KK §13.3 states that the GIA Deposit equals:

*“twenty percent (20%) of Interconnection Customer’s estimated Network Upgrade costs identified in the draft GIA **minus the total amount of Commercial Readiness***

Deposits that Interconnection Customer has provided to the Participating TO for its Interconnection Request.” The section further provides: “The Participating TO shall use the GIA Deposit as (or as a portion of) the Interconnection Customer’s security required under GIA Article 11.5.”

EDFps requests that in its next draft CAISO clarifies language to implement the text of the tariff that implements what the tariff requires, simultaneously with submitting the GIA, that the IC must bring financial security posted up to 20%, from whatever % of NUs represented by the commercial readiness deposit.

Withdrawal Timeframe	Commercial Readiness Forfeited Amount
IR submission to start of cluster study	None
Start of cluster study until start of restudy (or IF study if no restudy is needed)	2X study deposit • < 80 MW: \$35,000 + \$1,000/MW • 80 MW < 200 MW: \$150,000 • 200 MW: \$250,000
Start of restudy until start of IF study	Greater of study deposit and 5% of Network Upgrades
Start of IF study until GIA is executed	Greater of study deposit and 10% of Network Upgrades
Upon GIA execution or within 10 BD of request for unexecuted filing	Greater of study deposit and 20% of Network Upgrades

2. Initial Commercial Readiness Deposit timing

It is EDFps understanding that the commercial readiness deposit is due after the customer is notified that it has satisfied the applicable screening criteria and before the Customer Engagement Window closes—not at the application-window deadline. Could section 6.1 of the Draft BPM please be revised to reflect that later timing and be consistent with section 14.5?

The issue is the combination of the introductory deadline and the deposit listed underneath it in BPM §6.1, “Initiating an Interconnection Request.”

The introductory sentence says:

*“To initiate an Interconnection Request, the Interconnection Customer must submit all of the following **during the Cluster Application Window:**”* (Oct 1 – 15)

The list then includes:

“A Commercial Readiness Deposit submitted directly to the PTO, equal to two times the study deposit described in Section 3.5.1.1 of the RIS.”

The deposit amount and recipient are not the issue here—the timing is. Placing this deposit under that introductory sentence makes it due during the application window. Appendix KK §3.5.1.6 instead requires it **after notification that the screening criteria have been satisfied** and before the Customer Engagement Window closes. (Oct 22)

It also benefits CAISO to avoid unmercenary administrative churn created by collecting this deposit, only to avoid having to later return any deposits to projects that did not pass the screening.

3. Sustainability condition in non-LSE affidavits

Section 9.1.4 of the Draft BPM retains an affidavit requirement concerning the non-LSE counterparty’s corporate sustainability policy or goals. Specifically it says, “The affidavit must attest the counterparty is supporting the Interconnection Request in support of corporate policy goals on sustainability;”

However, per Appendix KK §4.1.1

“The affidavit must attest the capacity of the Interconnection Request aligns with its individual needs; the counterparty and its holding company, if any, is not affiliated with the Interconnection Customer or its holding company; and that the counterparty and its holding company and affiliates support this Interconnection Request only, and no other Interconnection Requests in this Cluster Application Window..”

Sustainability does not appear to be an eligibility condition. Could CAISO please remove that condition from the BPM while retaining the other approved affidavit requirements?

4. Substantial-revision protections

Sections 35, 39, and 41 of the Draft BPM describe substantial-revision protections using error-or-omission language. Specifically, section 41 is titled “Substantial **Errors or Omissions** in the Interconnection Facilities Study Results Report Allowing Refunds.”

However, Appendix KK §6.8.1 defines substantial revisions through specified cost increases, delays, or counterparty termination of a power purchase agreement. Section 6.8.4 states that, after posting the second Commercial Readiness Deposit, an eligible

customer may receive a “one-hundred percent (100%) refund of its remaining, unspent Commercial Readiness Deposit and all remaining, unspent Study Deposit funds” if it receives a **substantial revision** and withdraws within the applicable 60-day period.

The tariff does not appear to make these protections contingent on demonstrating an **error or omission**. Could CAISO please align the BPM with the tariff’s substantial-revision triggers and associated refund protections, including the applicable eligibility conditions and withdrawal deadlines?

5. Commercial-viability implementation in the next PRR

Section 45 of the Draft BPM is titled “Commercial Viability Criteria for Retention of Deliverability beyond Seven Years in Queue” and currently states, “Pending updated tariff language.”

However, Appendix KK §6.7.4 states that CAISO’s agreement to the specified modifications for a facility whose Commercial Operation Date “has exceeded or will exceed seven (7) years” from receipt of its interconnection request “will be predicated upon the Interconnection Customer’s ability to meet and maintain the following commercial viability criteria.”

The approved requirements apply to qualifying extension requests for energy-only projects as well as projects retaining deliverability. We understand that FERC approved these revisions effective August 5, 2026. Could CAISO please include the complete BPM implementation language in the next PRR, with a full stakeholder review period, so stakeholders have sufficient time to review the criteria, applicable grace period, and annual-review provisions?

6. Implementation deposit

Section 52 of the Draft BPM addresses GIA execution and associated deposits but does not appear to include the implementation deposit required under Appendix KK §13.3.1.

However, Appendix KK §13.3.1 states,

“Within thirty (30) days of the effective date of the GIA, the Interconnection Customer will provide the CAISO with a \$35,000 implementation deposit. Generating Facilities interconnecting pursuant to a Participating TO tariff must

submit a \$6,000 implementation deposit at the commencement of the CAISO new resource implementation process.”

Could CAISO please include these requirements in the BPM, together with the payment instructions and applicable reconciliation and refund treatment?

7. Remove References to the ISP Process

CAISO eliminated the Independent Study Process from the RIS through its Order No. 2023 compliance filing submitted on May 16, 2024, which FERC accepted in relevant part on May 15, 2025, effective May 17, 2024. CAISO explained that ISP was a serial study process inconsistent with Order No. 2023’s transition to cluster studies, and that retaining it would divert engineering resources needed to meet the new cluster-study deadlines.

Accordingly, could CAISO please remove the remaining references to the Independent Study Process in BPM sections 18.5 and 21.1?

BPM section	Exact language containing the reference	Suggested correction
§18.5 — Fast Track Supplemental Review, Safety and Reliability Screen	“...without studying the Generating Facility in either the Queue Cluster or Independent Study processes.”	Replace with “without studying the Generating Facility in the Queue Cluster process.”
§21.1 — Timing for Identification of Identified Affected Systems	“The CAISO will provide notice to Potentially Affected Systems at the beginning of the cluster or independent study process of each Interconnection Request...”	Replace with “at the beginning of the cluster study process...”