



Re: California ISO Business Practice Manual Proposed Revision Request 1391

The Westlands Solar Park appreciates this proposed revision to the BPM for Generator Interconnection and Deliverability Allocation Procedures. The clarification, as described on the PRR 1391 webpage, “that capacity effectuated through the CAISO's modification processes may seek an allocation for TP Deliverability” is useful and important. In general, we support the BPMs more explicitly addressing the addition of storage and how storage additions are treated under existing processes.

Given that the ISO is clarifying the treatment of storage additions in the deliverability allocation process, we request clarification that the ISO plans to allow storage additions to seek deliverability in the fall of 2022 as part of the typical deliverability affidavit process, and that deliverability allocations will be awarded in 2023. Cluster 14 will not be seeking deliverability next fall due to the new supercluster procedures (including the related impact to parked projects), but we believe the ISO should continue to hold an affidavit and allocation cycle in 2022-23 for projects that qualify for an allocation group.

Thank you for your consideration.

Dated: November 12, 2021

Respectfully submitted,

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