



**Stakeholder Comments Template**

**Supercluster Interconnection Procedures**

This template has been created for submission of stakeholder comments on the Supercluster Interconnection Procedures final proposal and draft tariff language that were published on June 14, 2021. The proposal, draft tariff language, stakeholder meeting presentation, and other information related to this initiative may be found on the miscellaneous stakeholder meetings webpage at:

<http://www.caiso.com/informed/Pages/MeetingsEvents/MiscellaneousStakeholderMeetings/Default.aspx>

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com). Submissions are requested by close of business on **June 28, 2021**.

<b>Submitted by</b>	<b>Organization</b>	<b>Date Submitted</b>
<i>Jin Noh and Sergio Duenas 510-665-7811</i>	<i>California Energy Storage Alliance</i>	<i>June 28, 2021</i>

**Please provide your organization’s comments on the Supercluster Interconnection Procedures final proposal, and June 21 stakeholder call discussion:**

The California Energy Storage Alliance (CESA) appreciate the efforts by the California Independent System Operator (CAISO) to engage stakeholders in this initiative to consider pathways to interconnect the large volume of interconnection applications already in the queue as well as the Queue Cluster (QC) 14 “supercluster”. With 11,500 MW of incremental system capacity needed in the 2023-2026 period, procedures set in this initiative will play an important role in ensuring the timely deployment of resources needed for system reliability. Compared to the Issue Paper and Draft Final Proposal published on May 14, 2021, the Final Proposal published on June 14, 2021 makes minimal changes. Overall, CESA is supportive of the clarifications provided in the Final Proposal, with limited modifications.

As explained in the Final Proposal, the proposed timelines are intended to be conservative and provide upfront transparency on timelines, which can be advanced or accelerated as the interconnection study process progresses. Due to concerns about making significant changes “midstream” of a process that has already started, such as proposals to add viability criteria, CESA prefers approaches that involve providing interconnection customers (ICs) with additional pieces of information (e.g., known transmission constraints, lack of deliverability in a given area) to inform whether to stay in

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the queue or advance to the next phase, which may winnow the number of applications and projects to study, thereby shortening the timelines than those outlined in the Final Proposal. Considering the interconnection process is often used to obtain information, expert CAISO staff input and the packaging of upfront available information in a user-friendly way may help reduce the number of interconnection applications. The CAISO should also consider whether there are certain pieces of information (e.g., standardized specifications) that could be provided by inverter or other equipment manufacturers that can help streamline the interconnection study process.

In particular, CESA wishes to express our strong support for the clarification that Independent Study Process (ISP) projects seeking deliverability and waiting for Phase 1, Phase 2, and TPD allocation results could be awarded available interim deliverability on a temporary basis if commercial operation date is achieved before the study is completed. To improve upon the Final Proposal, however, CESA recommends that the CAISO not subject pre-QC14 ISP projects to supercluster procedures since ICs had to demonstrate that the cluster study process cannot accommodate their commercial online date (COD) and that they are electrically independent, thus justifying a reliability assessment separate from other projects. These projects were expecting deliverability allocations by the “next cluster” but due to delays in QC14, these projects are being subject to unexpected delays. As a result, it is reasonable to not only award them interim deliverability but also to not apply supercluster procedures to these projects.

An additional area to improve upon the Final Proposal would be to exempt projects with executed power purchase agreements (PPAs) or contracts from the supercluster procedures and timelines, putting them on the “usual” two to two-and-half year timeline in order to ensure projects come online. While not supporting the addition of viability criteria at this time, an executed contract is different from a signifier of viability but one of need, for which a load-serving entity (LSE) has contracted for. Such “vintage” projects already have study report(s) tendered and PPAs awarded as part of, for example, a distribution deferral project, but are facing unnecessary and unexpected delays due to QC14 delays. The CAISO should strive to ensure that contracted resources come online on time.

In an effort to reduce the QC14 application volume and reduce the likelihood that the full one-year delay involved in the proposed supercluster procedures materializes, as well as to increase the odds that Phase 1 study results are more meaningful and informative, CESA recommends two additional solutions for CAISO consideration:

- **Encourage developers to consolidate applications:** If there are duplicative applications from same developer at the same or similar point of interconnection (POI), CESA believes that a consolidation of applications could reduce the volume of applications and MW that need to be studied, leading to more realistic Phase 1 study reports and greater likelihood of reducing the delay in timelines. The duplication of applications may mirror the option in competitive solicitations to submit multiple offer variations, but encouraging developers to consolidate applications may help compress supercluster timelines while maintaining equity among ICs.

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- **Allow out-of-cycle MW downsize opportunity:** Combined with CAISO expert advice on known transmission constraints or lack of deliverability in particular locations, a one-time MW downsizing opportunity may improve the usefulness of Phase 1 study reports. Since Phase 1 reports will be advisory according to the Final Proposal, ICs will remain in the queue and advance to the Phase 2 study process, but if more upfront guidance and information is provided, it could similarly lead to more realistic Phase 1 study reports and greater likelihood of reducing the delay in timelines.

Finally, CESA appreciates the CAISO's clarification that the supercluster procedures considered within the Final Proposal will only apply to QC14, deferring broader reforms for all future superclusters to consideration in the Interconnection Process Enhancements (IPE) Initiative in Fall 2021. We look forward to participating in the upcoming IPE Initiative to address these important issues.

### **Please provide your organization's comments on the Supercluster Interconnection Procedures draft tariff language:**

CESA has no comments on the draft tariff language reflecting the Final Proposal, but if any of the above limited modifications are adopted, revised draft tariff language should be published for review.