



Submit comment on Final proposal and draft Tariff language

Initiative: Interconnection process enhancements 2023

1. Please share your organization's overall position on the final proposal:

The California Energy Storage Alliance (CESA) appreciates the opportunity to comment on the California Independent System Operator's (CAISO) Interconnection Process Enhancement (IPE) 2023 Track 1 Final Proposal and draft tariff language. CESA appreciates CAISO's efforts to implement improvements to the interconnection process needed to accommodate the growing demand for grid integration and ensure timely and cost-effective interconnection of projects in the queue.

As highlighted in the IPE Track 1 Final Proposal, the immediate adjustments proposed to the schedule for processing and studying QC 15 IRs is in the interest of allowing adequate time for completing QC 14 Phase II studies before starting the heavy workload of the QC 15 process. That said, CESA reiterates that, while the delay to QC 15 is not ideal, adjusting the schedule to QC 15 in order to prioritize QC 14 Phase II studies is appropriate.

However, the CAISO should consider further clarifying certain aspects of the Final Proposal to prevent further uncertainty for QC 15 interconnection customers (IC). Specifically, the CAISO should clarify whether there were modifications to the timing and types of refunds that are available to withdrawing customers in QC 15. The Track 1 Final Proposal highlighted that several stakeholders requested some level of relief from the CAISO holding deposits without any significant progress being made on IRs until April 2024 (e.g., refund IC study deposits or site exclusivity deposits). However, the CAISO contends that this is not a viable option, given that some ICs provided site exclusivity deposits in-lieu of demonstrating site control, and would not be able to refund ICs that made financial commitments to acquire site control, unlike ICs that provide a site exclusivity deposit. Yet, the CAISO also stated in the Final Proposal that the proposed refunds are already allowed "on or before 30 calendar days following the scoping meeting", and that the ISO does not propose to alter existing deposit refund provisions. However, given the increased uncertainty QC 15 ICs are facing with the delay to QC 15, changes to other timelines in the process, and potential reforms that will impact their QC 15 IRs, the CAISO should clarify whether there were modifications to the timing and types of refunds that are available to withdrawing customers in QC 15. Providing further clarifications on the refunds allowed will reduce the amount of uncertainty ICs are facing navigating the various proposed changes to previous, current, and future QC timelines. Specifically, **to avoid any confusion, there should be a clear indication of whether the deadline for withdrawing an IR and receiving a refund on all deposits is April 1, 2024, on or before 30 calendar days following the scoping meeting, or if the timing could potentially be impacted by the completion of QC 14 Phase II studies, considering the changes in timelines have been driven by the prioritization of QC 14.** Above all, CESA urges the CAISO to further clarify in detail the exact changes, if any, to the timing and the types of refunds available to QC 15 ICs.

2. Please provide a summary of your organization's comments on the draft Tariff language.

In the Track 1 Final Proposal and draft tariff language, the CAISO proposed revising the deadline for TOs to publish QC 14 Phase II study reports, given that Pacific Gas and Electric Company (PG&E) needs more time to complete studies since the majority of IRs in QC 14 are in PG&E territory. Considering PG&E's need for additional time to complete QC 14 studies, the CAISO proposed revising the deadline for publishing QC 14 Phase II study reports for all TOs including PG&E by a couple of months (*i.e.*, from November 24, 2023, to January 31, 2024). CESA believes that this is appropriate, considering the need to prioritize QC 14 Phase II studies.