



California ISO


# 2023 Interconnection Process Enhancements Track 2 Working Group

August 1, 2023

# Housekeeping reminders

- This call is being recorded for informational and convenience purposes only. Any related transcriptions should not be reprinted without ISO's permission.
- These collaborative working groups are intended to stimulate open dialogue and engage different perspectives.
- Please keep comments professional and respectful.
- Please try and be brief and refrain from repeating what has already been said so that we can manage the time efficiently.

## Instructions for raising your hand to ask a question

- If you are connected to audio through your computer or used the “call me” option, select the raise hand icon  located on the top right above the chat window. **Note:** #2 only works if you dialed into the meeting.
  - Please remember to state your name and affiliation before making your comment.
- If you need technical assistance during the meeting, please send a chat to the event producer.
- You may also send your question via chat to all panelists.

# Agenda

Time	Topic	Presenter
9:00am – 9:10am	Introduction and Meeting Objectives	Kaitlin McGee
9:10am – 9:30 am	Updates and Announcements	Danielle Mills
9:30pm – 10:00am	Stakeholder Survey Results	Danielle Mills
10:00am – 12:00pm	Feedback on Intake Proposals	Bob Emmert
12:00pm – 1:00pm	Lunch	
1:00pm – 2:30pm	Feedback on Queue Management Proposals	Jason Foster
2:30pm – 2:45pm	Break	
2:45pm – 3:45pm	Feedback on Queue Management Proposals (cont'd)	Jason Foster
3:45pm – 4:00pm	Discuss Next Steps and Initiative Schedule	Danielle Mills, Kaitlin McGee

# CAISO Policy Initiative Stakeholder Process



We are here

- Working groups will inform the development of a straw proposal.
- The ISO will not request formal written comments between working group meetings, but will accept written comments after the final working group meeting to inform development of the Straw Proposal.
- The ISO will take notes and produce reports of each of our working group meetings.

# Working Group Structure - Roles

- **Facilitator** – the group will be managed by a designated ISO facilitator.
  - Responsible for guiding discussion, driving toward resolution of issues and toward deliverables.
- **Scribe** – the group has a designated scribe.
  - Responsible for capturing discussion and evolution or proposal(s), publishing meeting summaries, and working jointly with the facilitator.
- **Working Group Coordinator** – oversees overall working groups progression.
  - Responsible for overseeing working group engagement and ensuring consistency in organization or working groups.
- **Working Group Participants** – provide ideas, proposals, input and vetting.
  - Working groups are open to all stakeholders.
  - ISO staff will also be participants in working group.

# August 1 Work Group Objectives

- Discuss recent and relevant updates
- Share initial feedback on concepts and proposals discussed throughout working group process

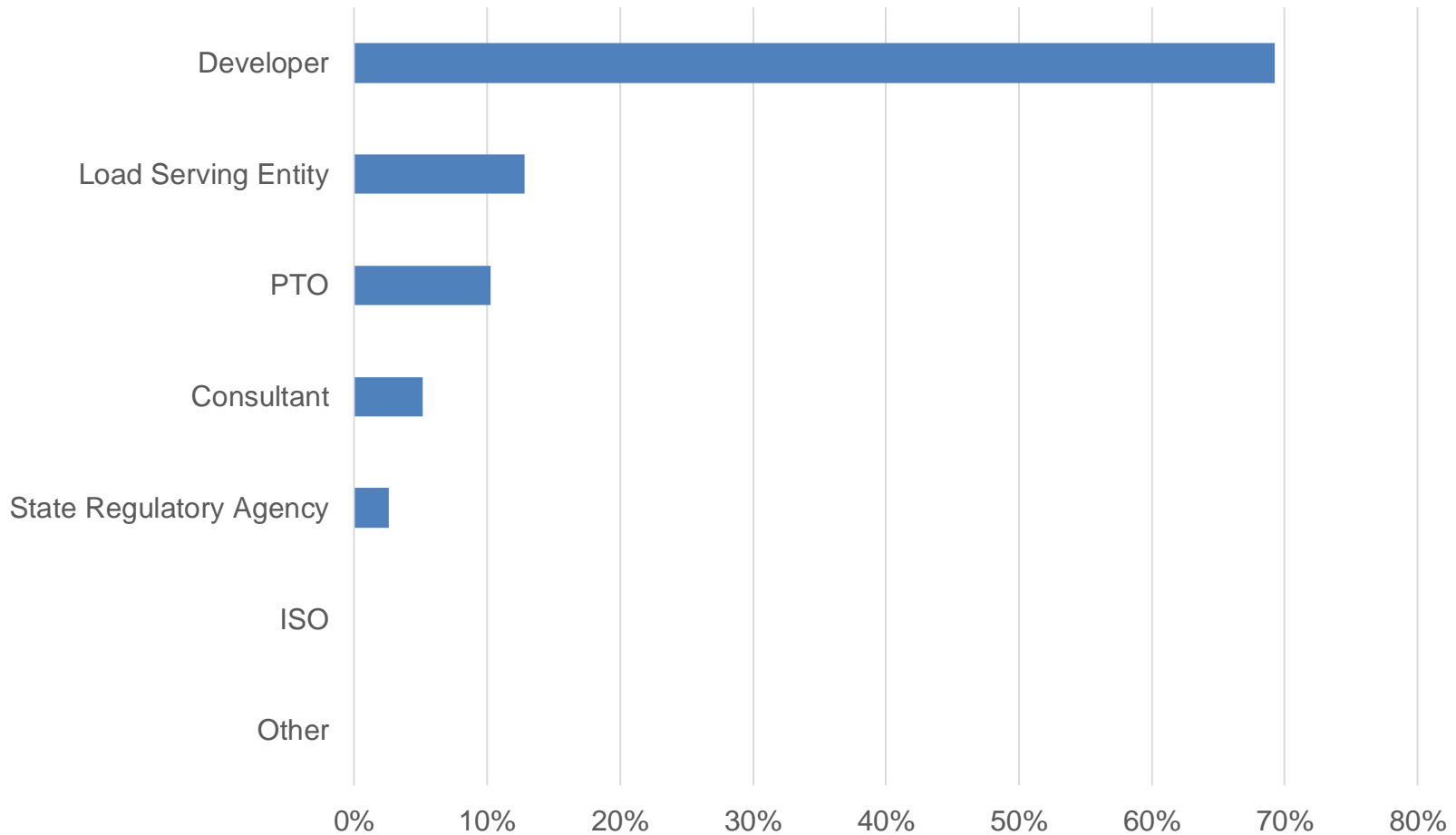
# Updates and Announcements

- Update on FERC Order, Adopted 7/27/2023
  - PG&E statement on Network Upgrades
    - *“PG&E is open to discussions with resources developer about having funds advanced to PG&E to maintain or, when possible, expedite network upgrade timelines. Reach out to your interconnection manager at PG&E if you would like to further discuss this option.”*
    - The ISO views this as outside of the scope of IPE, but recognizes its relevance to stakeholders, and encourages outreach and discussion of this issue outside of the initiative.
- Stakeholder survey results

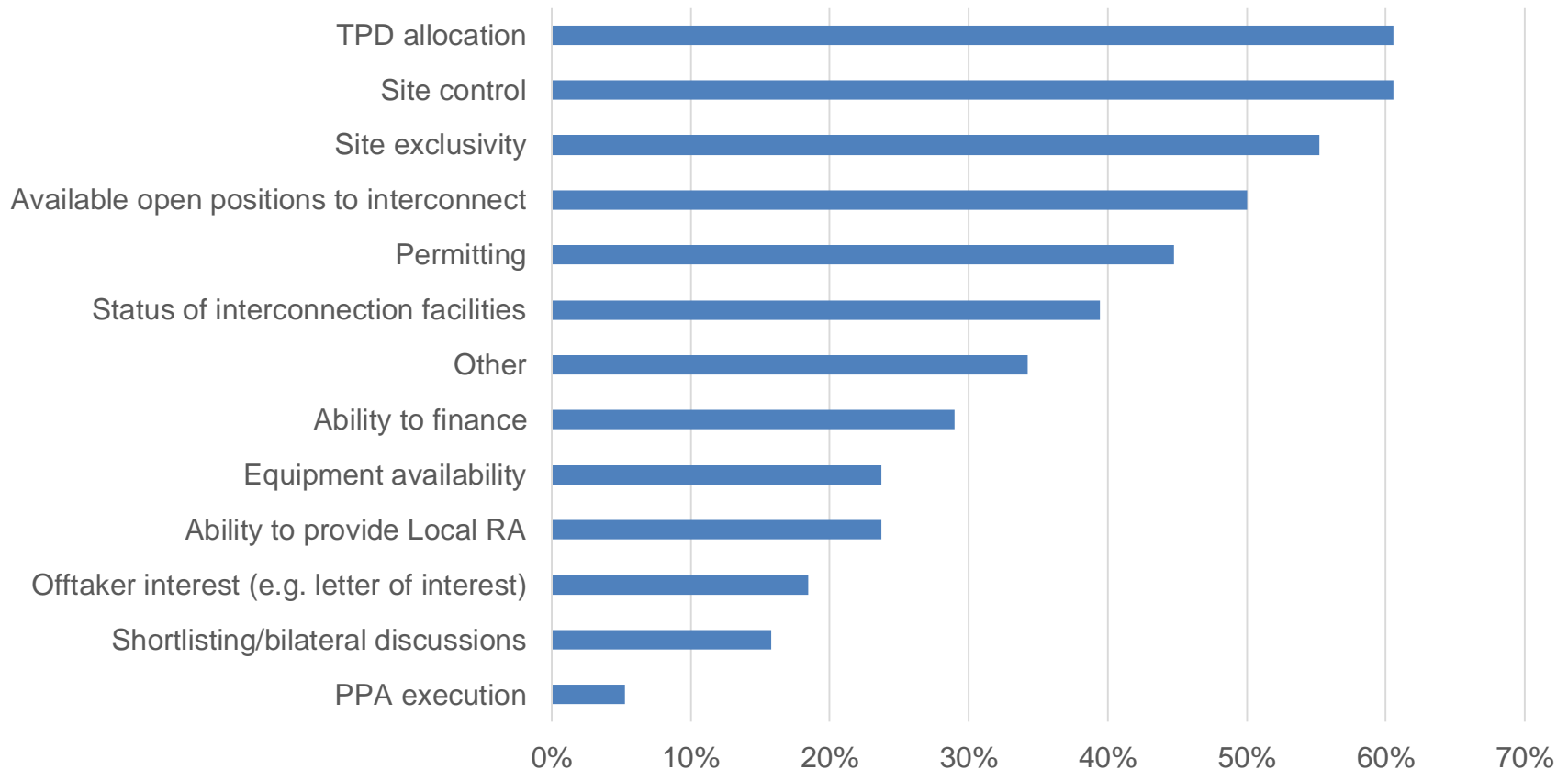


# STAKEHOLDER SURVEY RESULTS

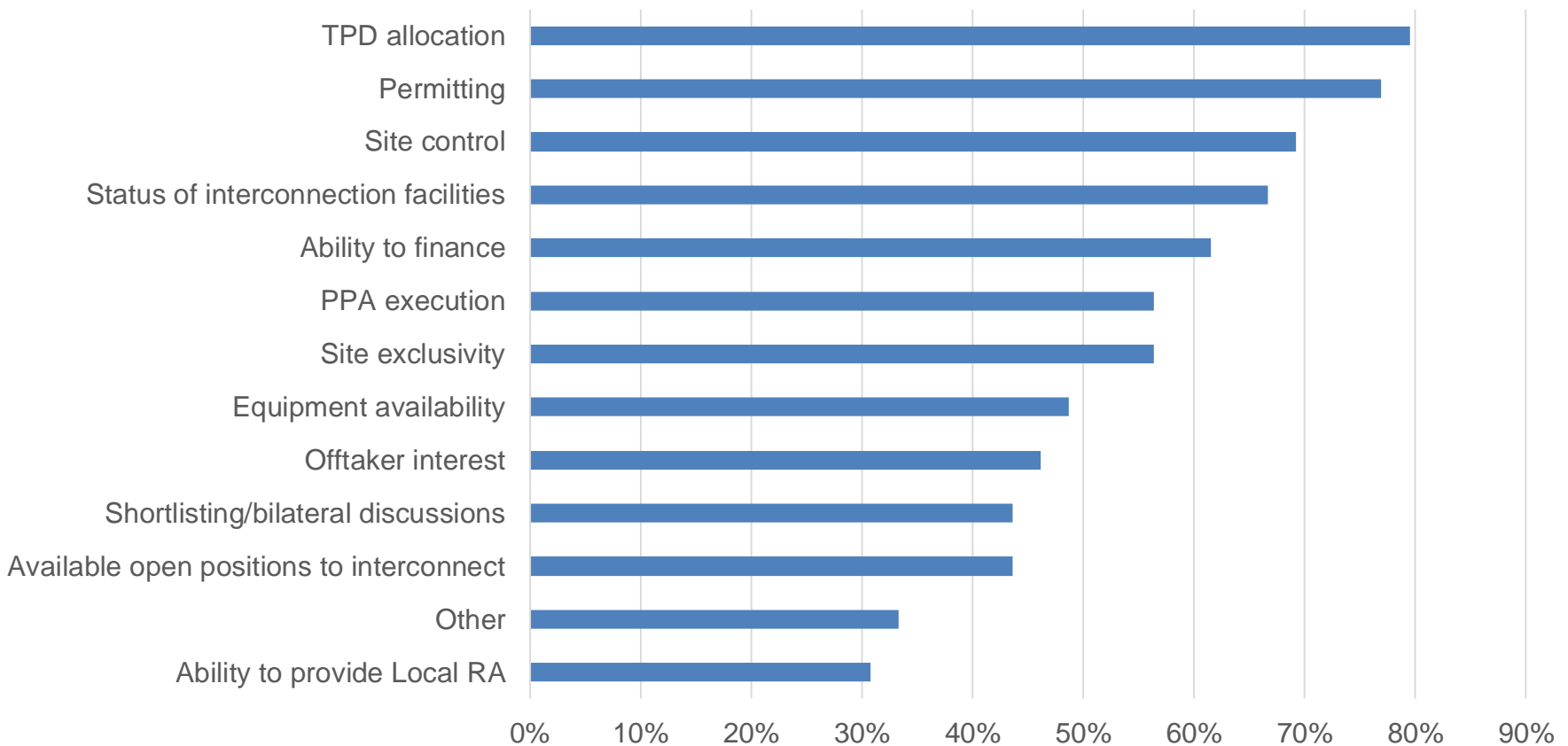
# What Stakeholder community do you represent?



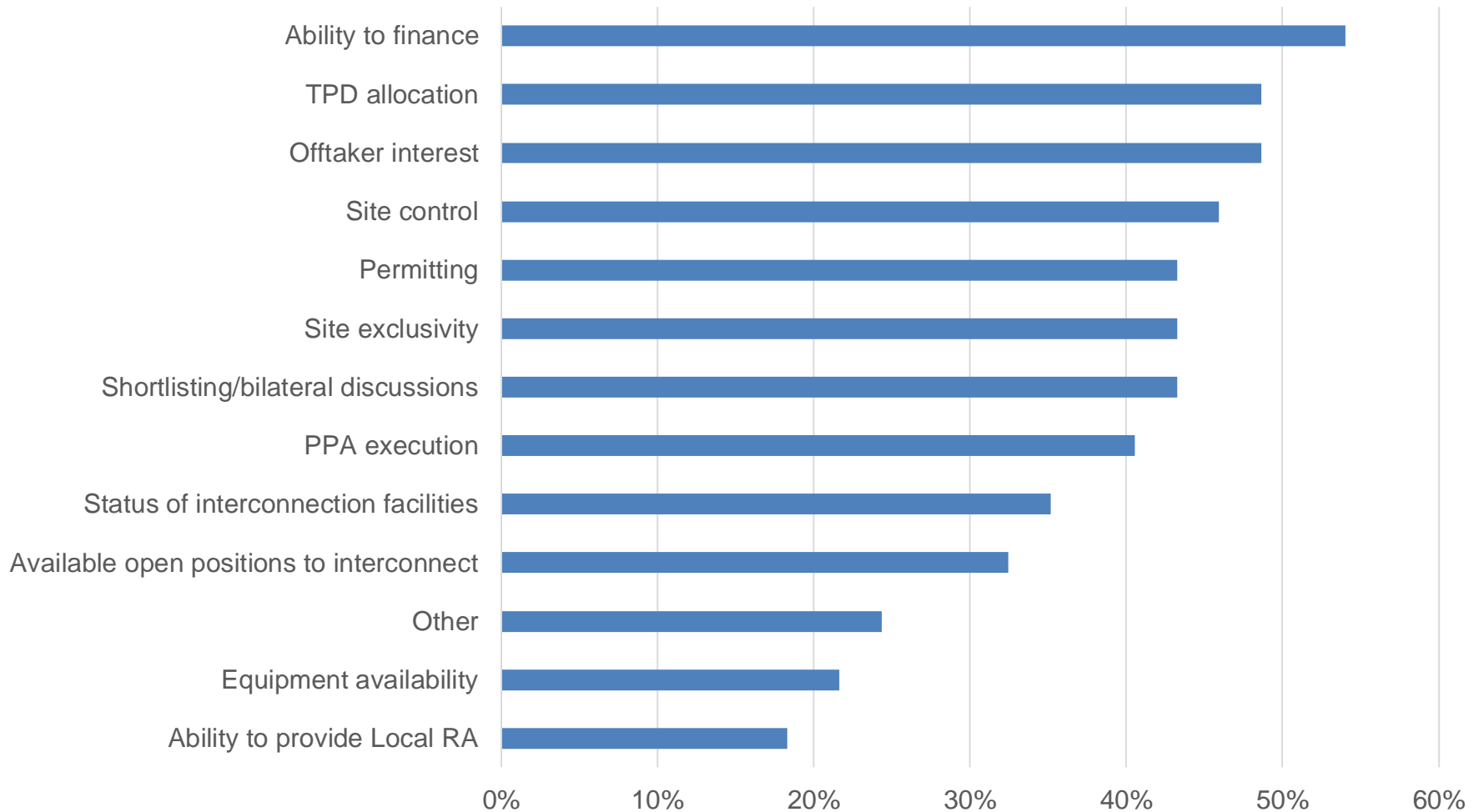
# What are your considerations when assessing viability of a project prior to submitting an interconnection request?



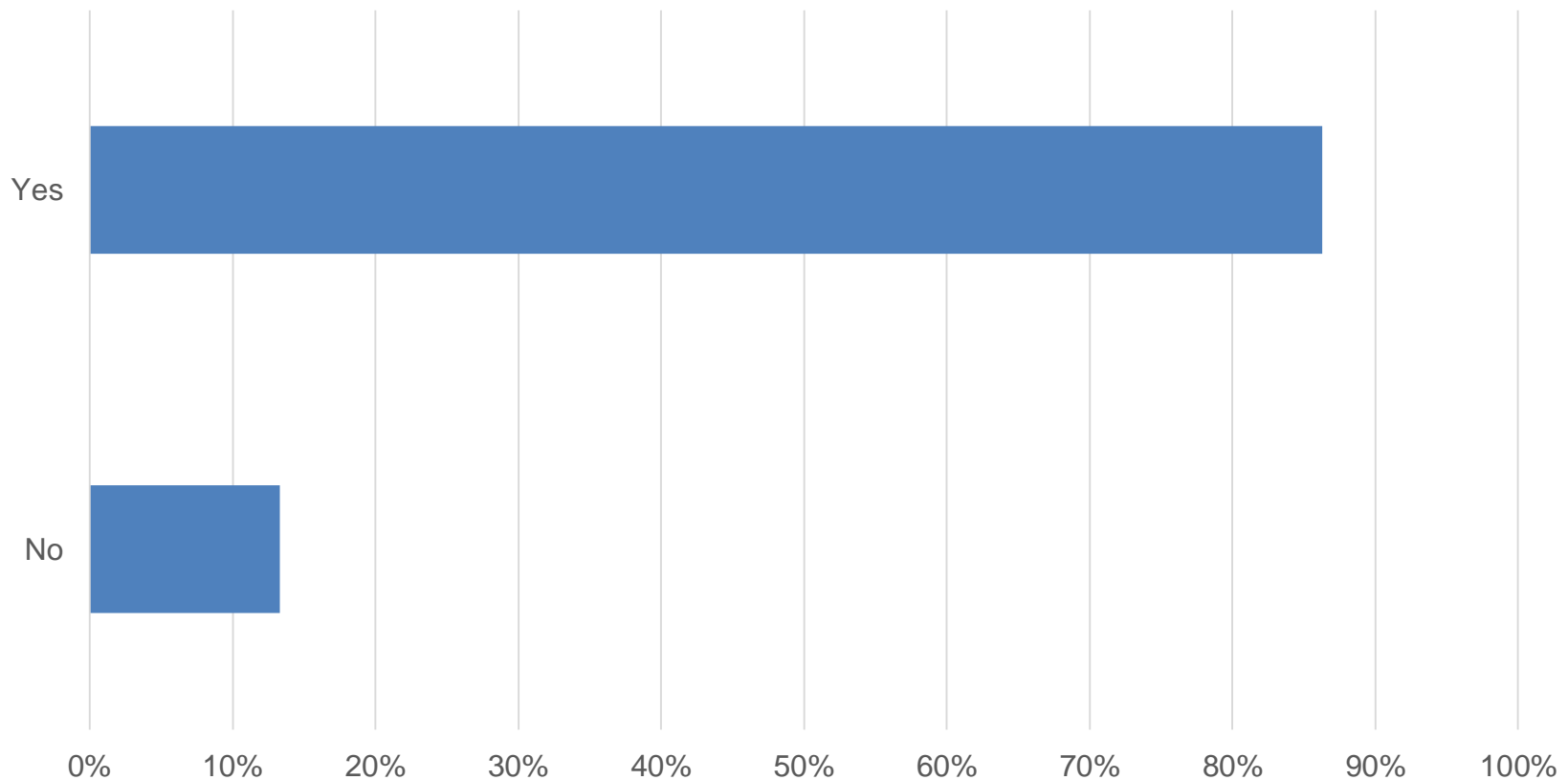
# What measures or factors help define a project's viability during or after the interconnection request process as the project proceeds to commercial operation and why?



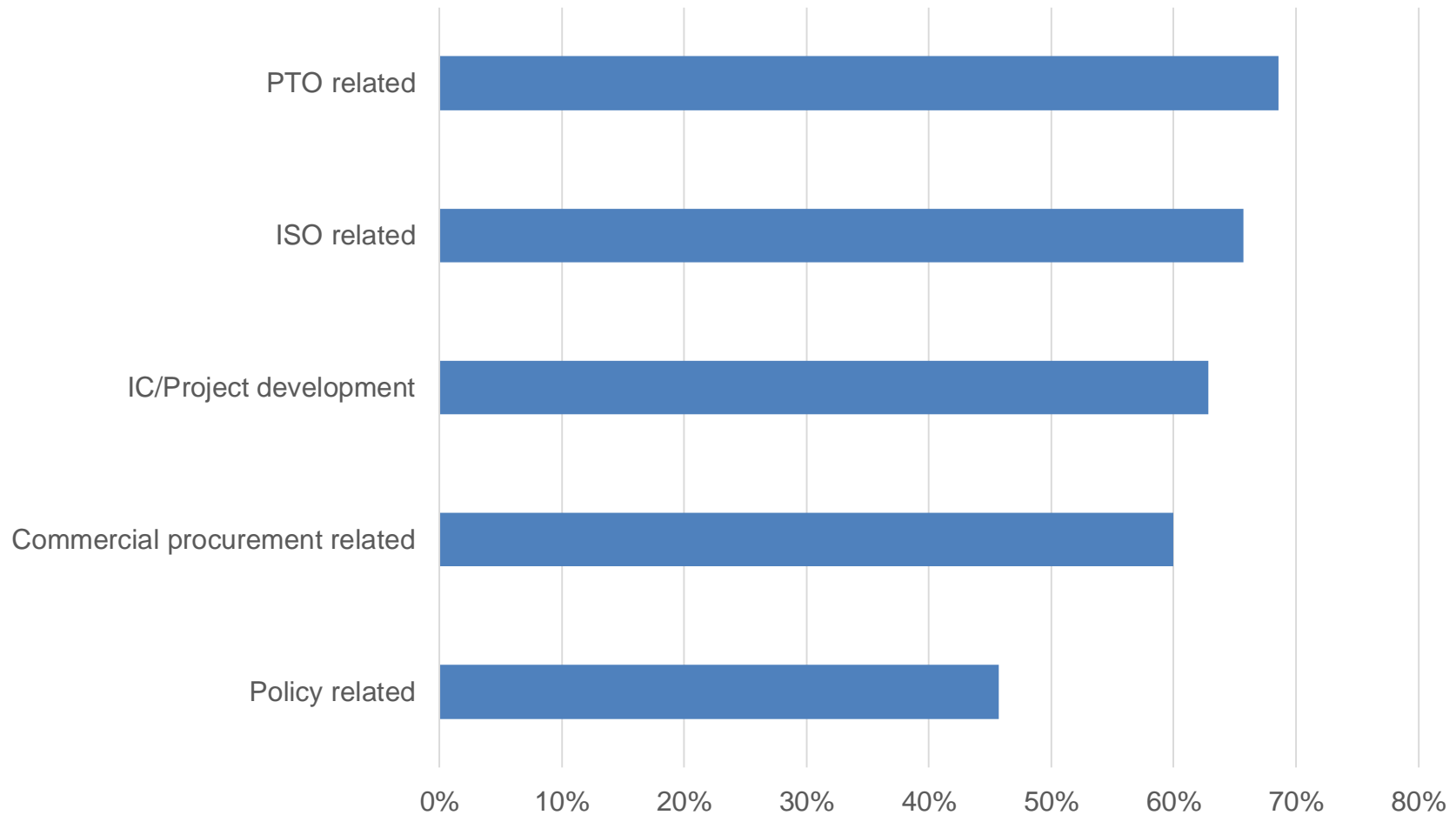
# What are your considerations when assessing viability of a project after being converted to EO?



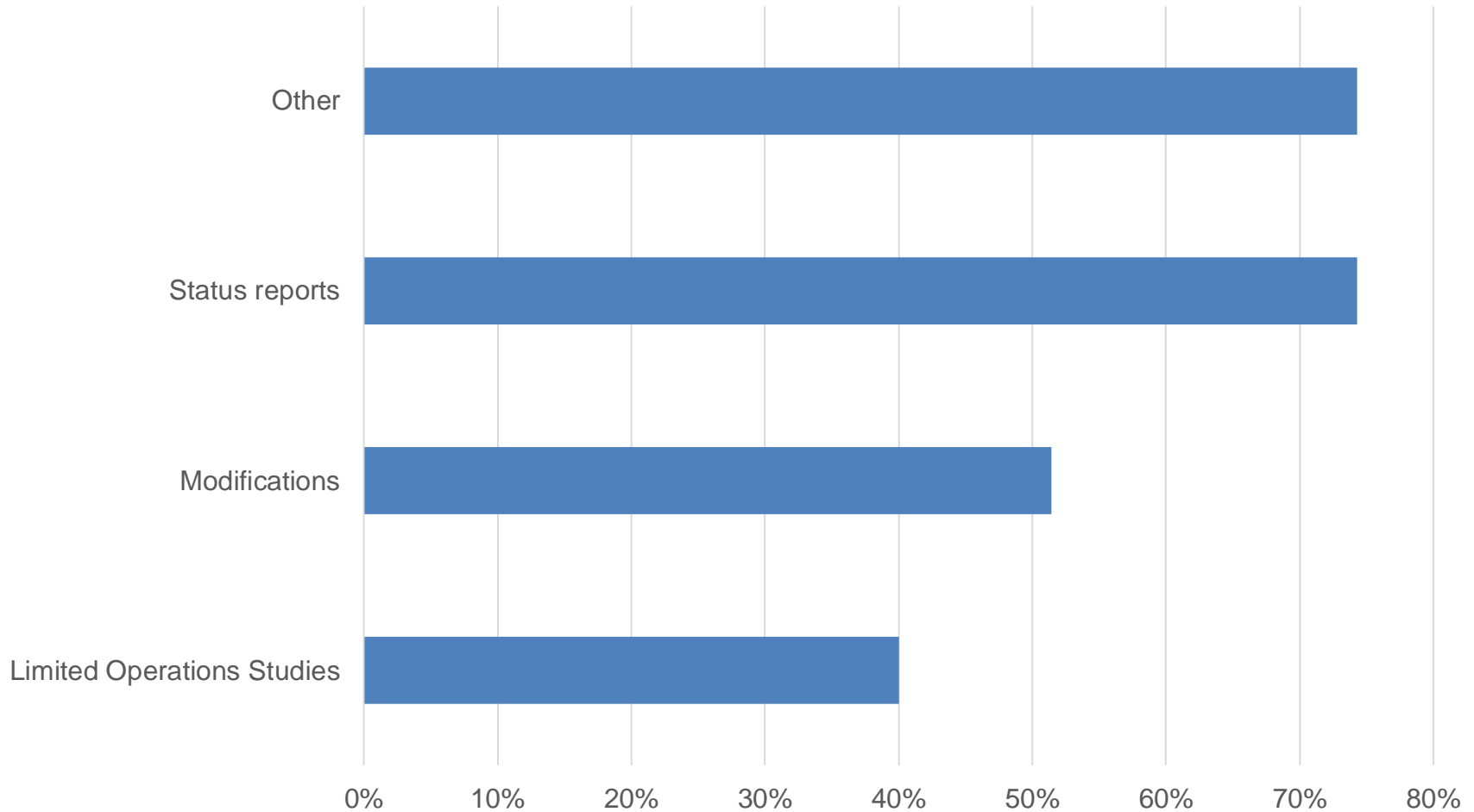
If given the opportunity, would you withdraw a project from the queue if you were provided all of your available Interconnection Financial security postings back, assuming it would not impact another project?



# Why are projects lingering in the queue?

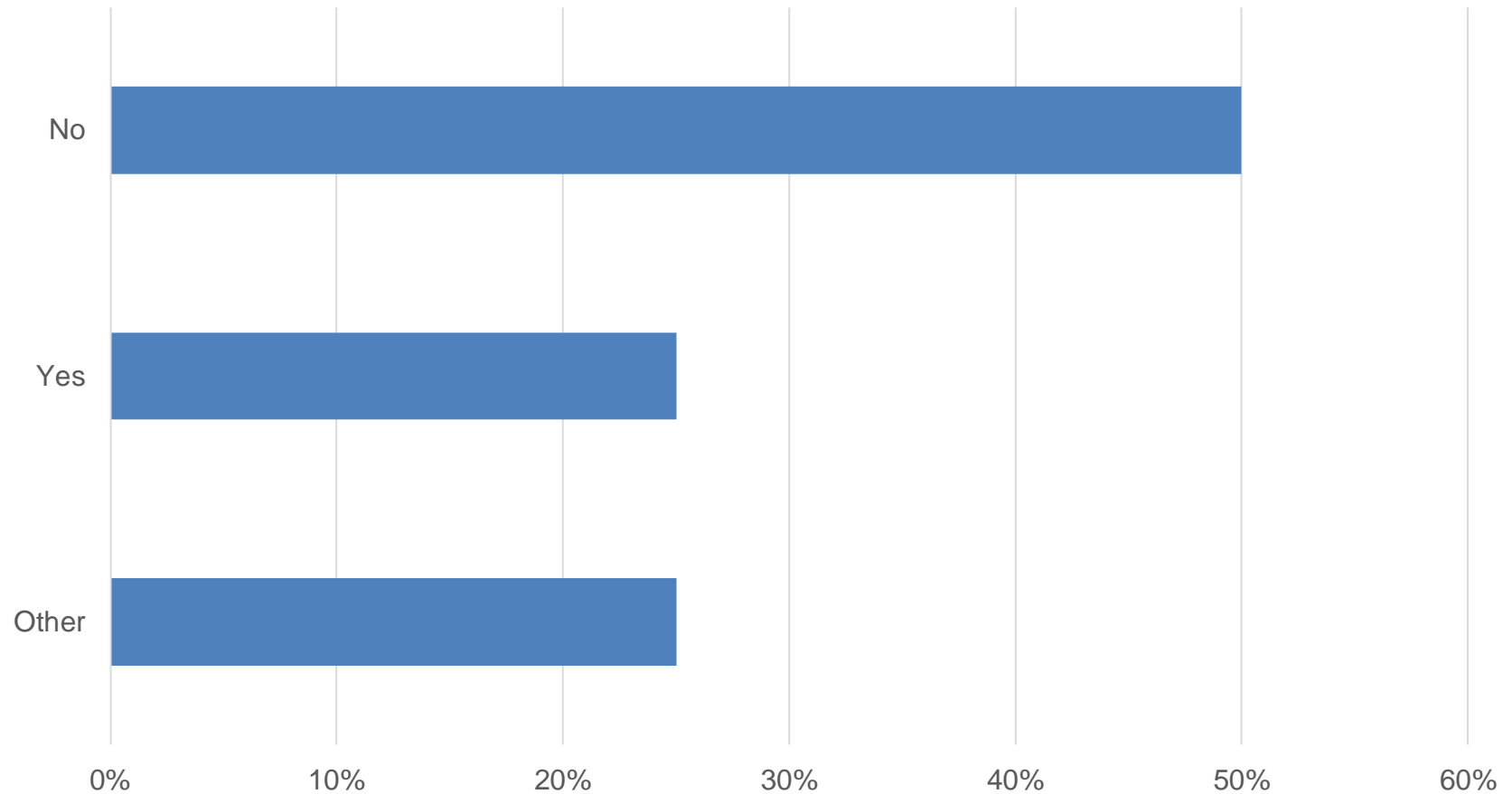


# What ISO processes could be updated to ensure that projects either continue to move forward or withdraw?

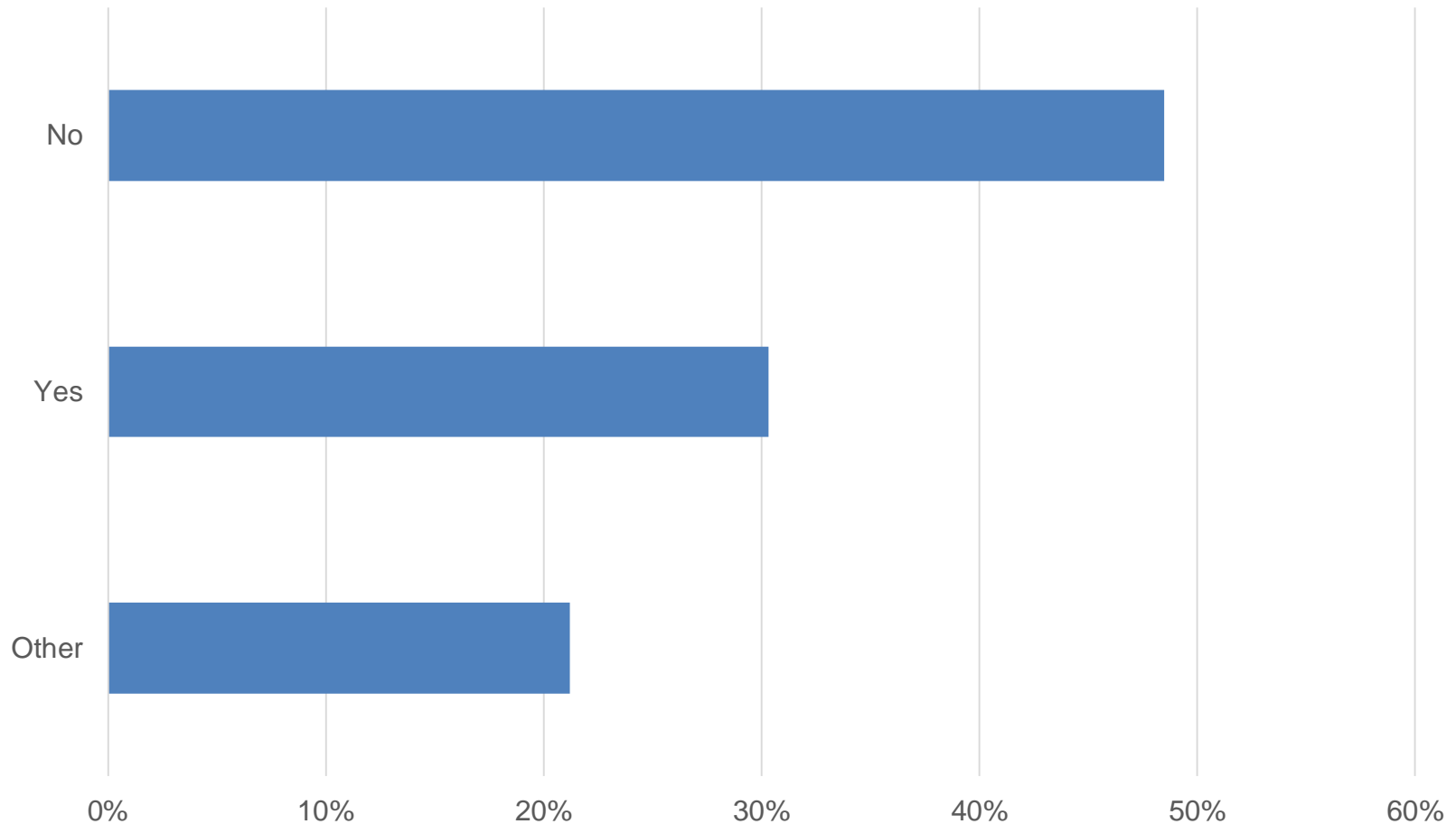




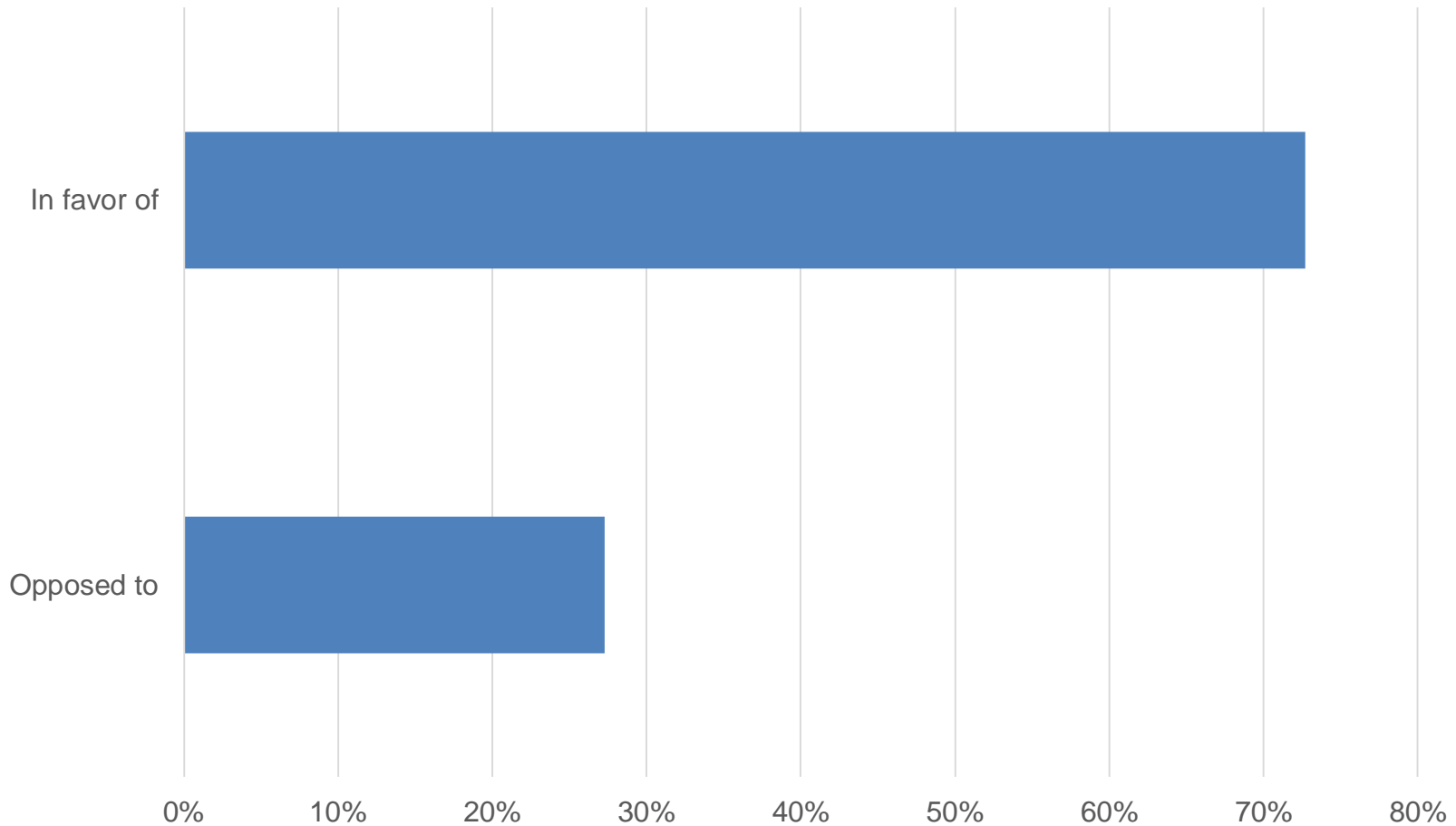
# Should the ISO establish defined times for modifications in advance of procurement



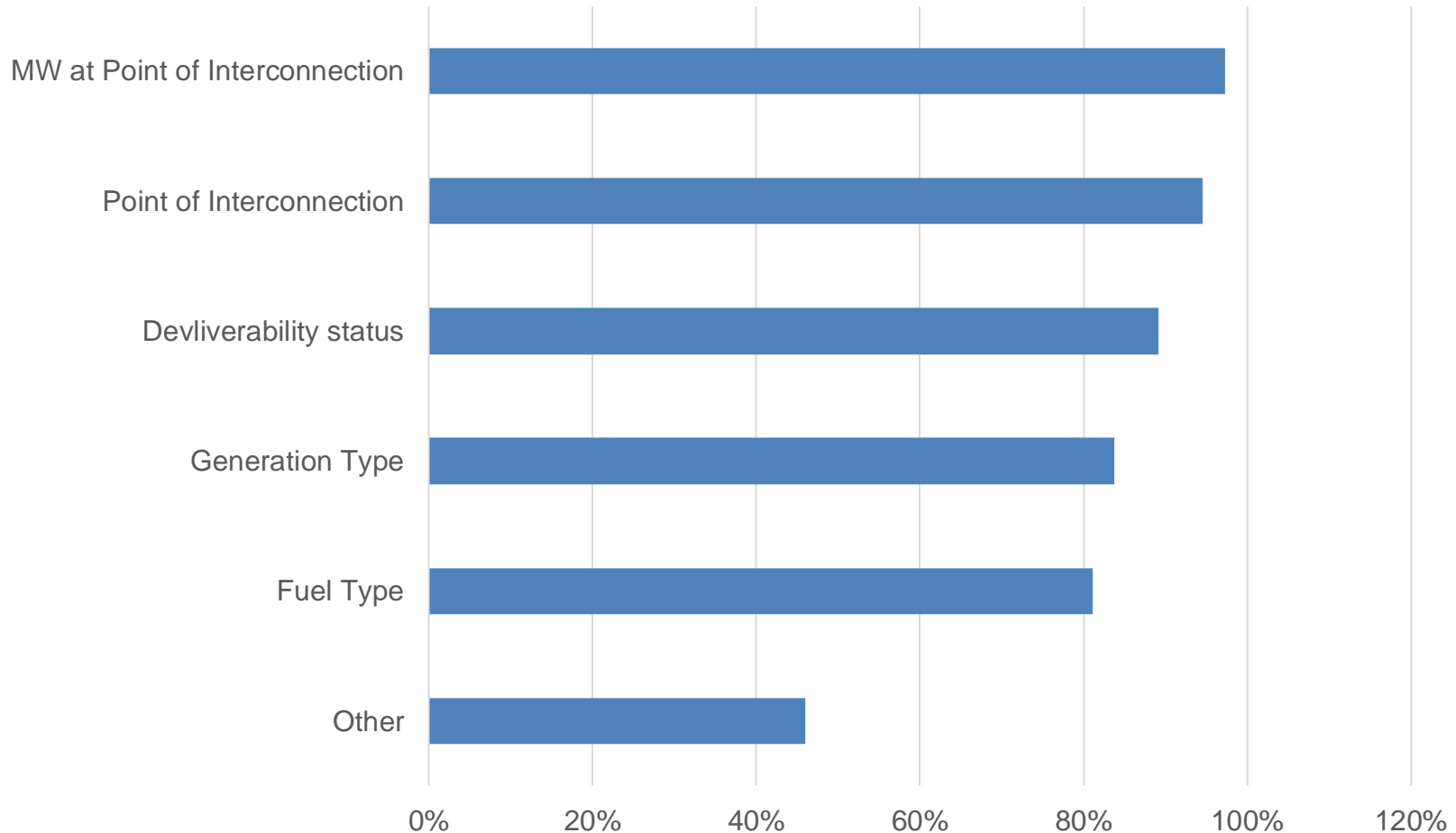
# Should the ISO establish defined times for modifications in advance of synchronization



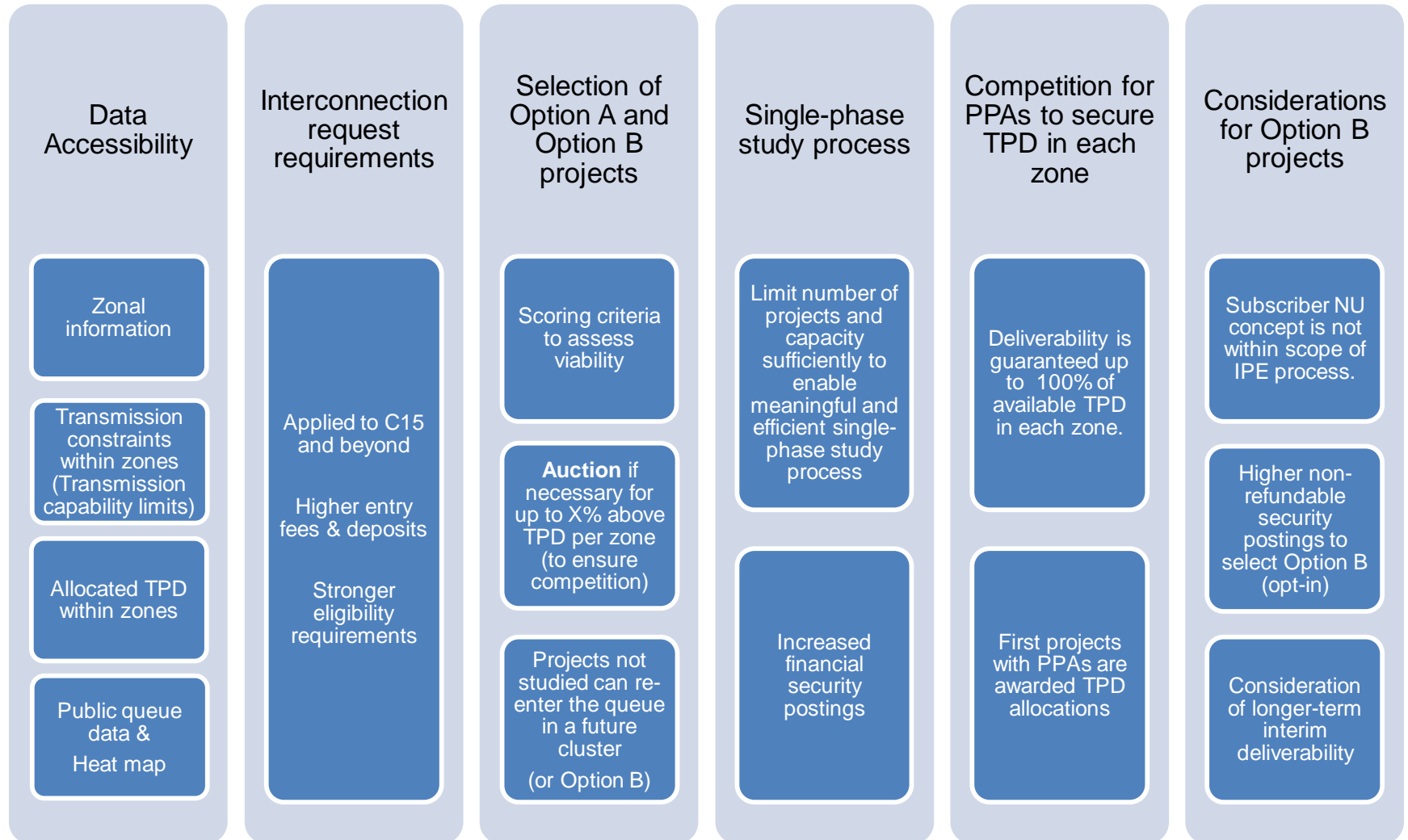
# Are you in favor of or opposed to publishing ALL Phase II study results publicly?



# What ISO queue data already provided by the ISO is most useful to you?



# Key Components: Interconnection Request Intake



# Managing the Queue – Requested Statistics

- Modification Request Validation Time:
  - Since 1/2021 – average 1st round is ~22 days, 2nd & 3rd round is ~15-18 days.
  - 2023 - Average 1st round is ~23 days, 2nd round is ~15 days, 3<sup>rd</sup> Round ~9 days.
  - With new Inverter Based Resource (IBR) Validation Tool Requirements in June 2023, these validations turns and time should reduce significantly.
- Projects in Queue that are Re-Active (after COD) that added BESS
  - 15 Projects re—entered queue to add BESS, 1,890 MW already complete and 2,185 MW BESS additions
- Suspensions
  - Two requests in 2022 and 2023, both active in suspension
  - Five on record 2020 and prior – Two not approved. Of the five, one completed, two projects withdrawn, and two projects in active status
- TPD Transfers (Project-to-project, not intra-project)
  - Seven Batch MMA transfer requests to maintain TPD exceedance factors
  - Two non-batch MMA – IC was the same for both
    - Scenario – 2 batch-process projects (A&B) transferred to 1 (C), that later transferred to another project (D). Project A&B are Cluster 1&2 projects that are online, Project (C) is withdrawn. Project D is still active without an executed GIA.

# Managing the Queue – Items Under Consideration

- Remove suspension rights
- Revise Attachment 7 (SGIA) to be consistent with Appendix H (LGIA)
- Improve LOS timeline as proposed in the discussion paper

## Managing the Queue – Items Under Consideration

- TPD Transfer limitations: Given the statistics that only one EO project has achieved COD as a stand-alone EO project in the past 8 years
  - Project transferring TPD will be withdrawn from the queue upon the approval of such transfer request
  - Continue with proposal that no transfer requests allowed once a project starts construction
    - Transfer requests for projects already under construction have never been requested, presumably because they have PPAs and are proceeding to commercial operation under that PPA.
  - TPD between resources within the same queue number is not considered a TPD transfer



# Managing the Queue – Items Under Consideration

- Viability Criteria and Time in Queue
  - Provide CAISO greater authority to hold projects accountable based on time in queue and COD/milestone extensions, not whether another project is impacted
  - Limit projects ability to linger in queue; intent to force progression to GIA execution, Notice to Proceed, construction, and commercial operation
  - Establish stronger milestones and documentation requirements for meeting construction, permitting, and other criteria

*As some stakeholders have pointed out, this pertains largely, but not entirely, to GM BPM Section 6.5.2.1 and Appendix DD Section 6.7.4 and GM BPM 6.1.5.1 for CVC.*

## Managing the Queue – Items Under Consideration

- Considering adding 4<sup>th</sup> (new 3<sup>rd</sup>) IFS posting at two years from study results being published. (75%)
  - This would follow TPD allocations, parking opportunities, etc.
- For shared upgrades, all projects must post financial security by the earliest date of one of the projects
- MMA/LOS interaction:
  - Clarify in GM BPM that technical-MMAs must be valid prior to LOS study start and that MMAs that impact LOS submitted after LOS will require LOS to be re-evaluated and potentially restarted

## Managing the Queue – Items Under Consideration

- Require negotiations consistent with existing timelines
- If MMA required to modify milestones due to IC delay, then IC has 10 BD to submit the MMA request or is penalized \$1,500/day until received by the CAISO.
  - Penalty must be paid within 10BDs of notification
- GIA and future modification results will identify a specific date for Notice to Proceed, if NTP not received by that date, project is in breach/withdrawn

# Managing the Queue – Items Under Consideration

- Only allowed:
  - To execute the GIA
  - Once final technology/equipment/POI is determined and IC is prepared to procure, (final decisions are made)
  - To align with PPA
  - Addition of BESS
  - 9 months prior to In-Service Date (synchronization)
- Increase deposit to \$30,000
- Increase time to complete Modifications to 60 Days
- Consider a call among the parties if there are issues with data validation

# One-Time Withdrawal Opportunity

- IC's submit Withdrawal Notice (considered withdrawn upon receipt)
- PTOs will not inherit cost responsibility due to a withdrawals
  - waive Appendix DD section 14.2.2
- All cost responsibility/shifts will fall to any current or later-clustered project(s) that have:
  - A shared NU, and/or
  - A PNU that the withdrawing project was supposed to fund
    - Cost Responsibilities (CCR, MCR, MCE) may increase
- If this is not acceptable to stakeholders, then the ISO proposes to drop the proposal.

# NEXT STEPS

# IPE 2023 Track 2 Work Group Schedule

Date	Track 2 Milestone
07/24/2023	Working group session 4 (Virtual): Presentations and discussion on problem statement 2
08/01/2023	Working group session 5 (Hybrid): ISO and stakeholder feedback on core concepts
08/07/2023	Comments due
Mid-September	Straw proposal posting*
Mid-September	Stakeholder workshop*

*\*Timeline subject to change*

To implement process changes ahead of Cluster 15 phase I studies, the ISO seeks to present Track 2 to the Board of Governors in February 2024.

## Additional information

- Visit initiative webpage for more information:  
<https://stakeholdercenter.caiso.com/StakeholderInitiatives/Interconnection-process-enhancements-2023>
- If you have any questions, please contact  
[isostakeholderaffairs@caiso.com](mailto:isostakeholderaffairs@caiso.com)