



May 22, 2024

By Email: Juan E. Buitrago (jbuitrago@caiso.com)

Ms. Jan Schori
Chair
California ISO Board of Governors

Re: Interconnection Process Enhancements

Dear Chair Schori and Members of the Board,

The California Community Choice Association (CalCCA) respectfully submits this letter to the California Independent System Operator (CAISO) Board of Governors regarding CAISO management's Interconnection Process Enhancements (IPE) proposal, which will be discussed at the May 23, 2024, meeting and decided upon at the June 12, 2024, meeting. CalCCA asks that the CAISO Board of Governors direct management to adopt the IPE proposal.

CalCCA is a trade association representing the interests of 24 community choice aggregators (CCA) in California. CalCCA's membership serves over 14 million customers in over 200 cities and counties throughout the state, representing roughly one-third of the CAISO load in California. As load-serving entities (LSE) actively procure new electric generating resources to serve California customers, California CCAs have a direct interest in ensuring an efficient and effective interconnection process that supports the accelerated pace of clean energy resource development.

The IPE proposal advances much-needed transformations to the interconnection cluster study and queue management processes while maintaining open access to the transmission system. The proposal intends to prioritize interconnection requests by ranking requests within available transmission zones based on indicators of readiness; commercial interests, project viability, and system needs. It also recognizes the importance LSE interest will play when narrowing down the pool of interconnection study requests.

LSEs, as procuring entities, conduct long-term planning activities in their individual integrated resource plans, where they start to identify the technologies, locations, and magnitudes of projects they will pursue to support the communities they serve. LSEs must procure a range of technologies to meet reliability and green-house gas-reduction targets in a cost-effective manner that meets their customers' needs and, for some LSEs like CCAs, directives from their boards. This information is factored into the California Public Utilities Commission's (CPUC) preferred system plan, which then informs the CAISO's transmission planning process. Without an LSE interest scoring criterion, the CAISO would risk having an interconnection queue that is not aligned with resource and transmission planning processes taking place in these forums. Given that reliability depends critically on having the right mix of resources on the grid, this alignment with planning is fundamentally important to CAISO's operations.



CCAs are committed to making the LSE point allocation process as transparent and fair as possible. The CAISO can play an important role in this by providing LSEs with a complete dataset on interconnection requests including technology type, interconnection point, capacity, and developer as early as possible to make sure no project inadvertently “falls through the cracks” and to provide a complete picture for LSEs’ prioritization of different interconnection requests vs. the pool of options. Given the in-depth considerations LSEs will put into their scoring, CalCCA urges the CAISO to provide LSEs with at least a month between when the application window closes and the scoring allocations are due, to ensure LSEs have enough time to allocate their points thoroughly and effectively. CalCCA supports the CAISO’s objective of a robust, fair, and transparent point allocation process, and sufficient information availability and scoring time will support this objective.

CalCCA appreciates the direction provided by the CAISO in its addendum to the Final Proposal on best practices to incorporate into the LSE point allocation processes. CCAs are open to continuing to work with the CAISO and developers to improve the LSE point allocation process as LSEs, the CAISO, and developers gain experience with the new interconnection study process.

Given these considerations, CalCCA respectfully asks that the CAISO Board of Governors direct management to adopt the IPE proposal.

Respectfully,

Eric Little
Director of Regulatory Affairs
CALIFORNIA COMMUNITY CHOICE ASSOCIATION