

November 8, 2023

Neil Millar

Vice President, Infrastructure and Operations Planning
California Independent System Operator Corporation (CAISO)
250 Outcropping Way
Folsom, CA, 95630

Subject: Request for Extension of Timeline for the Interconnection Process Enhancements 2023 Track 2 Stakeholder Initiative

Dear Mr. Millar,

The California Independent System Operator (CAISO) and stakeholders have been working together on the Interconnection Process Enhancements (IPE) 2023 Track 2 stakeholder initiative since June 2023. In this very compressed timeline stakeholders have developed policy proposals and submitted extensive comments on the CAISO's straw proposal.

We hear CAISO staff concerns about limited staff resources and the compressed timeline that would be needed in order to have new policies FERC approved in time for starting the Cluster 15 study. We appreciate CAISO staff messaging at the November 2, 2023 stakeholder meeting that the CAISO will be revising the initiative schedule. We believe that an extension of at least 90 days is necessary to allow time for deliberate and specific dialog between CAISO and stakeholders. The IPE stakeholder initiative is of great importance to the California energy sector; the policy must be rooted in empirical data, and finalized with the general consensus of all parties. A 90-day extension will allow time for the CAISO to provide meaningful and specific feedback on the numerous stakeholder proposals, the 180 pages of stakeholder comments on the CAISO's straw proposal, and to develop an example of the pre-study window interconnection report. The success of the zonal study approach is entirely dependent on the accuracy and usefulness of this yet-to-be-developed report.

We believe a 90-day timeline will not meaningfully impair the Cluster 15 study work, as the conclusion of the IPE 2023 Track 2 policy will likely indicate that the CAISO should move its annual interconnection request window to June, after annual Transmission Planning Process reports are typically approved so that the in-zone-out-zone analysis can be done based on the best data possible. Coincidentally the FERC has also seen fit to extend Order 2023 compliance from December 5, 2023 to April 4, 2024.

Thank you for your attention to this matter. Please contact Renae Steichen (rsteichen@revrenewables) if you would like to discuss further. We look forward to your response and the opportunity to collaborate on this important initiative.

Sincerely,

AES Clean Energy
Avantus Clean Energy LLC
California Energy Storage Alliance (CESA)
California Wind Energy Association (CalWEA)
Clearway Energy Group
Gridstor
Independent Energy Producers Association (IEPA)
Key Capture Energy
Large Scale Solar Association (LSA)
New Leaf Energy, Inc.
REV Renewables
Solar Energy Industries Association (SEIA)
Terra-Gen, LLC
Vistra

CC: Joanne Serina, Vice President, Stakeholder Engagement and Customer Experience

Danielle Mills, Principal, Infrastructure Policy Development