



Submit comment on April 5, 2022 meeting discussion

Initiative: Interconnection process enhancements 2021

1. Please provide your organization's comments on the Interconnection Process Enhancements (IPE) 2021 - Data Transparency April 5, 2022 stakeholder call discussion: *

CESA appreciates the ISO's Data Transparency Initiative as a key Phase 1 item since these efforts will facilitate smarter siting decisions (especially where there is available transmission deliverability), inform decisions to proceed or withdraw from the queue (thereby potentially managing the overheated queue), and support procurement decisions by load-serving entities (LSEs). With much of this information in an accessible format, the ISO may mitigate (though not eliminate) superclusters in the future, where interconnection customers would more logically select points of interconnection (POIs) that make the overall interconnection process smoother, efficient, and manageable. At a high level, CESA believes that the preliminary Data Transparency Matrix is generally comprehensive but could be presented or summarized in a more useful way, such as in one consolidated format without looking at multiple reports or in a way that is consistent between resource and transmission planning activities.

CESA offers comment on select data categories included in the preliminary Data Transparency Matrix:

- **Availability of existing and interim deliverability:** CESA believes that several transmission data categories capture information that could be used to calculate remaining deliverability, such as the MW available without upgrades, as well as where and how much Transmission Plan Deliverability (TPD) remains. CESA supports efforts to make available deliverability information more centralized and readily available and accessible. Additional information on the phasing of projects could support these ends as well. Moreover, CESA requests further information on interim deliverability that is available that could support near-term projects and allow some projects to come online earlier and be procured to meet near-term reliability challenges until the actual, necessary upgrades are constructed to support all relevant projects in a cluster. This information may be readily available somewhere, but it was not captured in the preliminary Data Transparency Matrix.
- **Resource ID, technology type, and fuel type:** CESA generally supports greater transparency into the status (*e.g.*, online, suspended, withdrawn) and ID of projects in the queue. To the degree that this information is already available, this information will be helpful for all interconnection customers and LSEs to assess the prospects and costs of interconnection relative to other projects in the queue. The ISO's proposed efforts to restructure and simplify the column for resource "fuel type" is helpful and could presumably be implemented with minimal effort. In addition, CESA believes information on the selection of either the hybrid versus co-located market participation option, as well as the MWh and technology type of energy storage resources likely represent low-lift implementation tasks that could also inform procurement activities and policy discussions.

As the ISO aims to make it easier to access information across multiple reports in a consolidated way, CESA also requests that the ISO consider ways to structure the information to make it easier for stakeholders to follow the “bread crumbs” of all the presented information. That is, the ISO should consider ways to establish a consistent list of data fields used in reports that flow between resource and transmission planners. For example, some CESA members have reported on the different zones used by resource planners for the purposes of the Integrated Resource Plan (IRP), in contrast to those used by ISO transmission planning. Such discrepancies create an additional burden for stakeholders to identify how planned transmission upgrades may align with planned or future generation and storage, or it could lead to error on the part of interconnection customers in making these calculations and determinations for rationally siting new-build generation and storage. While not a transparency issue *per se*, this recommendation would support the accessibility and usability of information, which advances the goal of the Interconnection Process Enhancements (IPE) Initiative to manage the overheated queue and facilitate rational siting decisions.

2. Please provide any additional, specific data you believe the CAISO could share publicly and in what format would you like to see such data published: *

CESA supports the following additional specific data to be made transparent and publicly available:

- **Site exclusivity information:** Notwithstanding the ISO’s IPE Draft Final Proposal on site exclusivity requirements, CESA recommends that the ISO also include information on whether interconnecting projects have site control as part of generator-related data transparency efforts, which is likely easy to implement and could support efficient decision-making for interconnection customers to move forward in the process. For example, knowing that many other projects in the queue and at a given area have site control, it may inform developers on whether to move forward with submitting a deposit in lieu of site exclusivity, which is currently being proposed to have a greater portion of the deposit at risk.
- **Appropriate interconnection queues by POI:** In line with the Phase 1 proposal included in the IPE Draft Final Proposal, CESA supports the implementation of the proposal to differentiate POIs and locations by whether the interconnection is jurisdictional to the ISO-controlled grid versus the Wholesale Distribution Access Tariff (WDAT). This information should be provided in Excel format in the near term, with long-term plans to make it available in an online map.

3. Please provide a description of what value it brings by providing such data: *

CESA supports the following additional specific data to be made transparent and publicly available:

- **Site exclusivity information:** By making this data transparent, developers will have better information on their project viability relative to others in the queue, and it can potentially facilitate management of the current overheated queue.
- **Appropriate interconnection queues by POI:** This proposal would avoid inefficiencies and lost time and resources to moving through the wrong interconnection process.

4. Please provide the priority of the change being requested (high, medium, low): *

CESA provides our recommended prioritization of some of the select data categories or areas above:

- **Availability of existing and interim deliverability:** High
- **Site exclusivity information:** High

- **Appropriate interconnection queues by POI:** Medium
- **Resource ID, technology type, and fuel type:** Medium

5. Other comments: *

While generally supportive of the efforts to increase data transparency, CESA also cautions that the any implementation of the above be balanced or pursued in a way that does not pull already-stretched ISO staff away from timely and efficiently completing technical studies in support of mid-term procurement needs. As ISO staff have discussed, a good portion of the information listed in the Preliminary Data Transparency Matrix is already available in the prior-cluster Area Reports accessible in the Market Participant Portal, but it requires the interconnection customer to obtain the desired information in multiple different reports and summarize themselves. To this end, CESA recommends that the ISO staff focus initially on presenting the disparate information into an Excel format and automate the process for updating and refreshing this information, while implementing some other data presentation features, such as online maps for the transmission system that may take a lot of time, resources, and IT-related considerations, to a later implementation phase.

However, we also note that efforts around organizing and making various data available in online maps is still worthwhile and important. Like the hosting capacity maps that the California distribution utilities have developed for distributed energy resources (DERs),¹ the ISO should also consider making information about deliverability, site exclusivity, queues by POI, and resource ID, technology, and fuel type available in a user-friendly online map. For reference, the Alberta Electric System Operator (AESO) just recently launched a Transmission Capability Map.²

Overall, before finalizing which areas to improve data transparency, CESA requests that the ISO staff provide information on the implementation challenges, costs, and timelines of any of the stakeholders' requests, which may help all stakeholders to assess which are worthwhile and/or which are critical for near-term implementation. In addition, the feasibility of the frequency of data refreshes will be a critical criterion to whether and how to move forward with various transparency efforts.

¹ <https://drpep.sce.com/drpep/>

² <https://www.aeso.ca/grid/connecting-to-the-grid/transmission-capability-map/>