



November 13, 2014

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Clean Coalition Motion to Intervene Out of Time and Answer to California Independent System Operator Corporation Motion for Relief from Reporting Requirements, Docket Nos. ER08-1317-003 and ER11-1830-000

Dear Secretary Bose:

The Clean Coalition hereby submits the attached Motion to Intervene Out of Time and Answer to the California Independent System Operator's ("CAISO's") motion for relief, which requested that the Federal Energy Regulatory Commission relieve the CAISO of the requirement to file interconnection queue quarterly progress reports.

I. CONTENTS OF FILING

This filing includes the following:

1. This transmittal letter;
2. A Motion to Intervene Out of Time; and
3. An Answer to CAISO's motion for relief from the requirement to submit the generator interconnection queue quarterly progress reports.

II. SERVICE

The Clean Coalition has served a copy of this filing on the parties listed on the official service list in the above-captioned proceedings. In addition, the Clean Coalition has posted a copy of this filing on its website.

III. CONCLUSION

The Clean Coalition respectfully requests that the Commission take into consideration the Answer included herein. Please contact the undersigned with any questions regarding this filing.

Respectfully submitted,

/s/ Brian Korpics
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**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System)	Docket Nos. ER08-1317-003
Operator Corporation)	ER11-1839-000
)	

**CLEAN COALITION MOTION TO INTERVENE
OUT OF TIME**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.212, 385.214¹, the Clean Coalition hereby moves to intervene in the above-captioned proceedings.

I. COMMUNICATIONS

Communications regarding this matter should be addressed to:

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II. MOTION TO INTERVENE OUT OF TIME

a. *Public Interest*

The Clean Coalition has a direct and substantial interest in the result of the interconnection reporting requirements at issue in these proceedings. The Clean Coalition is a California-based nonprofit organization that represents the public interest in its work

¹ “A motion to intervene must also state the movant’s interest in sufficient factual detail to demonstrate that . . . (iii) The movant’s participation is in the public interest.” 18 C.F.R. § 385.214(b)(2)(iii).

to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement, interconnection, and realizing the full potential of integrated distributed energy resources, such as distributed generation, advanced inverters, demand response, and energy storage. The organization participates in numerous proceedings before Federal, California, and other state agencies.

The Clean Coalition's interest cannot be appropriately represented by any other entity, and the organization's participation is in the public interest. The Clean Coalition represents the interests of consumers and customers that may be directly affected by the outcome of this proceeding. One of the Clean Coalition's core focuses is improving interconnection processes in California and across the country in order to enable higher penetrations of renewable energy that would benefit both energy consumers and customer-providers of distributed energy.² A critical part of reforming interconnection processes is gathering data on current procedures in order to understand why costly delays are occurring. Involvement in this proceeding will allow the Clean Coalition to share its expertise and offer suggestions to improve upon the Commission's interconnection reporting requirements.

b. Good Cause for Intervention Out of Time

The Clean Coalition asserts that good cause exists as to why the time limitation should be waived.³ The Commission first directed the California Independent Service

² The Clean Coalition has been closely involved in advancing the California Public Utilities Commission's interconnection reporting standards and the California Rule 21 reform process. *See* Cal. Pub. Utils. Comm'n, Order Instituting Rulemaking on the Commission's own motion to improve distribution level interconnection rules and regulations for certain classes of electric generators and electric storage resources, R.11-09-011 (filed Sept. 22, 2011).

³ *See* 18 C.F.R. § 385.214(b)(3).

Operator (“CAISO”) to begin submitting quarterly progress reports for its interconnection queue in 2008. However, the Clean Coalition had not formally launched as an organization until 2011.

Further, the Clean Coalition’s interest in the reporting requirements did not become germane until the CAISO submitted its motion to eliminate the reporting requirements on October 30, 2014. No disruption of the proceeding would result from permitting intervention. Intervention would allow the Clean Coalition to timely file an Answer to the CAISO’s Motion for Relief from Reporting Requirements. The attached Answer will serve to uniquely represent the public interest and will not in any way delay the proceeding. Finally, existing parties would not be prejudiced or burdened if the Commission permitted intervention. Instead, the parties would benefit from the Clean Coalition’s input based on its expertise with interconnection and reporting procedures.

III. CONCLUSION

For the reasons set forth above, the Clean Coalition respectfully requests that the Commission grant this motion to intervene in the above-captioned dockets.

Respectfully submitted,

/s/ Brian Korpics _____

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Dated: November 13, 2014

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System)	Docket Nos. ER08-1317-003
Operator Corporation)	ER11-1839-000
)	

**CLEAN COALITION ANSWER TO CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION MOTION FOR
RELIEF FROM REPORTING REQUIREMENT**

I. BACKGROUND

On October 30, 2014, the California Independent System Operator Corporation (“CAISO”) filed a motion with the Federal Energy Regulatory Commission (“Commission”) requesting relief from the requirement to file interconnection queue quarterly progress reports. In 2008, the Commission had directed the CAISO to begin submitting the quarterly progress reports in order to provide transparency to the Commission and interested parties concerning whether the CAISO’s generator interconnection procedure reforms were improving the interconnection process and reducing delays.¹ In the motion at issue, the CAISO submits that the benefits of quarterly progress reports do not outweigh the costs, and the Commission should therefore eliminate the reporting requirement. The Clean Coalition respectfully submits this Answer to CAISO’s motion.

II. ANSWER

The Clean Coalition supports the substantial improvements the CAISO has made to its interconnection and reporting procedures; however, substantial issues remain.

¹ Cal. Indep. Sys. Operator Corp., 124 FERC ¶ 61,292 (2008); Cal. Indep. Sys. Operator Corp., 133 FERC ¶ 61,223 (2010).

Although good cause exists to modify the reporting requirement, the Commission should deny the CAISO's primary request for relief, which would eliminate the reporting requirements. Instead, the Clean Coalition respectfully urges the Commission to adopt the CAISO's first and third alternative requests for relief—with slight modifications discussed below.

a. CAISO's Continued Progress

The Clean Coalition recognizes that the CAISO has made substantial improvements to its generator interconnection processes and related reporting. The CAISO's revisions to the interconnection processes and its stakeholder outreach process has yielded a more robust and streamlined program. The CAISO now posts much of the information included in the quarterly progress reports required by the Commission on its generator interconnection website, including the CAISO Generator Interconnection Queue Spreadsheet ("GIQ Spreadsheet").² The CAISO's practices in this regard set a noteworthy standard in both content and public access to informative data that is important both to interconnection applicants and all parties working with the CAISO to improve practices and outcomes. Information in the GIQ Spreadsheet substantially overlaps with the quarterly progress reports, which has been cited as a reason to relieve reporting burdens for other ISO/RTOs.³ As the CAISO noted in its motion, unlike the quarterly reports, interconnection customers often use and reference the GIQ Spreadsheet.⁴ Further, the CAISO continues to engage in an open stakeholder process to

² Cal. Indep. Sys. Operator, *A streamlined process for interconnecting generating facilities*, <http://www.caiso.com/planning/Pages/GeneratorInterconnection/Default.aspx> (last visited Nov. 11, 2014).

³ See Devon Power LLC, 121 FERC ¶ 61,138 at 23 (2007).

⁴ Cal. Indep. Sys. Operator Corp. Motion for Relief from Reporting Requirement 10, Fed. Energy Reg. Comm'n, Docket Nos. ER08-1317-003 & ER11-1830-000 (Oct. 30, 2014) [hereinafter CAISO Motion].

identify areas of improvement. Notably, after over six years of the CAISO filing quarterly progress reports, no party has filed responsive comments.⁵

Although the Commission should recognize the CAISO's proactive efforts to improve upon its interconnection procedures, many of the concerns that led the Commission to create the reporting requirements six years ago remain. Generators continue to face delays of up to three years from the time interconnection applications are first filed to execution of the agreements.⁶ It is also unclear what factors are causing generators not to take advantage of the available fast track procedures. Further reporting to the Commission could help to reveal what is causing these issues, which would benefit interconnection processes in California and across the country.

b. Alternative Request for Relief

In order to continue improving the CAISO's interconnection processes, the Clean Coalition supports the CAISO's first alternative request for relief, which would:

Eliminate the quarterly reporting obligation but require all of the information that the Commission had required to be included in the quarterly reports to be included in the GIQ Spreadsheet. For example, the GIQ Spreadsheet could be enhanced to include separate tables for customers using the fast track or independent study processes with the same information that the Commission required to be included in the quarterly progress reports.⁷

This compromise would reduce the CAISO's regulatory burden while enabling the Commission to continue monitoring interconnection procedures in California. The Clean Coalition further urges the Commission to require the CAISO to additionally publish past data reported to the Commission over the past six years that has not been included in the

⁵ CAISO Motion at 6.

⁶ See Cal. Indep. Sys. Operator, *A streamlined process for interconnecting generating facilities*, <http://www.caiso.com/planning/Pages/GeneratorInterconnection/Default.aspx> (last visited Nov. 11, 2014).

⁷ CAISO Motion at 12.

GIQ Spreadsheet. As identified by the CAISO, this data includes: (1) the number of requests for the fast track process that did not pass the required screens, and which screens the generators failed; and (2) the reason for any rejections of projects requesting independent study treatment.⁸

The Clean Coalition also supports the CAISO's third alternative request for relief, which would reduce the frequency of reporting to annually from quarterly. This would be permissible if the CAISO is required to continue publishing the current quarterly interconnection data on its website. The annual report to the Commission could then simply direct the Commission to the relevant online data while noting and discussing the issues the CAISO has identified and actions intended to address such issues.

The CAISO claims that “[v]irtually all of the interconnection customers who have withdrawn from the interconnection queue have done so due to reasons such as the failure to secure a power purchase agreement, necessary siting, or licensing, all of which are reasons contemplated by the CAISO’s tariff reforms.”⁹ Though this may prove to be true, the Clean Coalition believes a short annual report could help to explain why customers have withdrawn from the process, in addition to why the CAISO’s fast track procedures are not more widely used. In doing so, this annual report will provide assistance to the California Public Utilities Commission and other agencies in identifying and addressing the causes of application withdrawal, including the factors driving excessive or speculative applications which negatively impact the CAISO’s ability to study and process interconnection requests more rapidly.

⁸ *Id.* at 10.

⁹ *Id.* at 6.

III. CONCLUSION

The Clean Coalition supports the CAISO's improvements to its interconnection processes and believes that the suggestions above would help the Commission and the CAISO to continue building upon this progress. It is important to determine why most generators in California continue to use the CAISO's standard interconnection study processes and why there are still three-year delays to executing a final agreement. The steps outlined above would work towards the Commission's twin goals of reducing regulatory burdens and promoting development of generating facilities.¹⁰ Finally, the Clean Coalition recommends that the Commission promote the CAISO's interconnection processes and reporting procedures as national best practices.

Respectfully submitted,

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Dated: November 13, 2014

¹⁰ *Open Access and Priority Rights on Interconnection Customer's Interconnection Facilities, Notice of Proposed Rulemaking*, 147 FERC ¶ 61,123 at 2 (2014).