

DOCKETED

Docket Number:	23-OPT-01
Project Title:	Fountain Wind Project
TN #:	254929
Document Title:	FWP Supplement to Application for Confidential Designation TN 254006
Description:	N/A
Filer:	Caitlin Barns
Organization:	Stantec Consulting Services, Inc.
Submitter Role:	Applicant Consultant
Submission Date:	3/8/2024 9:51:43 AM
Docketed Date:	3/8/2024



March 7, 2024

Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Supplement to Application for Confidential Designation (TN 254006; January 19, 2024)

Dear Mr. Bohan,

On January 19, 2024, Fountain Wind LLC (the "Applicant") submitted an Application for Confidential Designation (TN 254006) (the "Application") for the following documents:

1. Fountain Wind 2019 Reassessment Report Cover Letter
2. 2019 Generator Interconnection Reassessment Study Report
3. Fountain Wind 2019 Generator Interconnection Reassessment Report Addendum
4. 2019 Generator Interconnection Reassessment Study Appendix B – System Assumptions
5. 2019 Generator Interconnection Reassessment Study Appendix E – Reliability Power Flow Results
6. 2019 Reassessment PGE North Interconnection Area Appendix G – Reliability Assessment Results
7. 2019 Reassessment PG&E North Interconnection Area Appendix I – Deliverability Assessment Results
8. Response to Modification Request for Fountain Wind (CAISO Queue #1106) Letter – February 15, 2018
9. Response to Modification Request for Fountain Wind (CAISO Queue #1106) Letter – December 27, 2018
10. Response to Suspension Request for Fountain Wind (CAISO Queue #1106) Letter – December 27, 2018
11. Request to Recommence only Design and Engineering Work on the Fountain Wind Project (Queue #Q1106) Letter – July 23, 2020
12. Response to Modification Request for Fountain Wind (CAISO Queue #1106) Letter – October 31, 2022

On February 20, 2024, the CEC issued its Response to the Application for Confidential Designation (TN 254573), granting the Application with respect to documents 2-7. The CEC denied the Application with respect to documents 1 and 8-12. The Applicant therefore submits this supplement to the Application to further explain why certain of these documents should be deemed confidential and requests that the CEC grant the Application for these documents.

First, the Applicant accepts the CEC's determination for documents 1, 10, and 11 and hereby submits those documents to the docket.

Documents 8 and 9 were previously deemed confidential by the CEC (see TN 251176) and, accordingly, were posted confidentially to the docket (TN 251247 and 251248). Therefore, the Applicant requests that the CEC maintain these documents as confidential, consistent with that determination, and delete the duplicates submitted in January from the docket.

Finally, the Applicant requests that the CEC grant the Application for document 12. Document 12 provides the CAISO's response to the Applicant's Material Modification Assessment ("MMA") request. An approved MMA is an agreement between the CAISO, transmission operator (i.e., PG&E), and the Applicant and constitutes an amendment to the project's Large Generator Interconnection Agreement ("LGIA"). The CEC has deemed the

LGIA confidential and should similarly treat amendments to that agreement—through MMAs—as confidential. Further, document 12 is similar to documents 8 and 9, which the CEC has accepted as confidential, and moreover provides commercially sensitive trade secret information regarding the Applicant’s interconnection process. Specifically, document 12 provides commercially sensitive trade secret information regarding the Applicant’s proposed commercial operation date, the timeline of network upgrades, and energy deliverability status. This information is not provided to the public or competitive energy market by the Applicant (or by any of its competitors or the CAISO). Disclosing this information would place the Applicant at a competitive disadvantage by providing competitors, electricity off-takers and suppliers bidding on work on the project important interconnection timeline and cost information, which could affect interconnection queue positioning and bids in competitive solicitations for interconnection, procurement, and power purchase agreements. Therefore, document 12 includes trade secret information and satisfies the criteria in 20 CCR 2505(a)(1)(D), in that the information contained therein derives independent economic value from not being generally known to the public, is the subject of reasonable efforts to maintain its secrecy, and its disclosure would place the Applicant at a commercial disadvantage.

Dated: 3/7/2024

Sincerely,

DocuSigned by:
Barbara Parsons
7E3636F16E82493...
On behalf of Fountain Wind, LLC

Its: Authorized Representative

July 31, 2019

Mr. Anders Bisgard
Pacific Wind Development, LLC
1125 NW Couch Street, Suite 700
Portland, OR 97209

Re: Q1106 – Fountain Wind Project
2019 Reassessment Report

Dear Mr. Bisgard:

The California Independent System Operator Corporation (“**CAISO**”) and Pacific Gas & Electric (“**PG&E**”) the Participating Transmission Owner (PTO) for your project completed the 2019 Reassessment for Fountain Wind Project (“Project”) in accordance with the CAISO’s Generator Interconnection and Deliverability Allocation Procedures (GIDAP) portion of the CAISO tariff. The reassessment updated the Network Upgrade requirements, PTO’s Interconnection Facilities, and the associated cost responsibility for the interconnection of the Project.

Sincerely,



J. E. (Jeff) Billinton
Manager, Regional Transmission - North



California Independent System Operator

December 27, 2018

Anders Bisgard
Director, Transmission Origination
Pacific Wind Development LLC
1125 NW Couch Street, Suite 700
Portland, OR 97209

RE: Response to Suspension Request for Fountain Wind (CAISO Queue # 1106)

Dear Mr. Bisgard,

The California Independent System Operator ("CAISO") has received Pacific Wind Development LLC's request dated September 28, 2018 to suspend Fountain Wind (the "Project") pursuant to Section 5.16 of the Large Generator Interconnection Agreement ("LGIA"). The letter requested that the CAISO and Pacific Gas and Electric Company ("PG&E") suspend all work on the remaining Reliability Network Upgrades ("RNUs") and Deliverability Network Upgrades ("DNU") effective November 30, 2018 and ending on May 30, 2020. The CAISO and PG&E have approved the suspension request.

Section 5.16 of the LGIA provides Pacific Wind Development LLC the rights to suspend work associated with construction and installation of PG&E's Interconnection Facilities, Network Upgrades and/or Distribution Upgrades for up to three years. Currently, the project has six (6) months of suspension left. A suspension pursuant to Section 5.16 does not automatically provide for a corresponding extension of the Commercial Operation Date ("COD"). When entering suspension an Interconnection Customer should take into account the time needed to build the Interconnection Facilities, Network Upgrades, and/or Distribution Upgrades to ensure that there is adequate time after suspension to achieve the approved COD. At this point, the CAISO and PG&E have approved the Material Modification Assessment request to extend the Project's COD to March 15, 2024.

The CAISO is focused on advancing projects in the queue to commercial operation. As part of this effort, the CAISO requests that the Project continue to provide quarterly status updates to ensure that the Project is meeting its milestones and is on schedule to meet its COD. Please keep in mind that failure to meet the milestones, if not cured under the LGIA, may result in a breach of the LGIA. If you have any questions, please feel free to contact Jill Jordan at (916) 608-5947 or jjordan@caiso.com.

If Pacific Wind Development LLC is in agreement with the terms set forth in this letter, please have a duly authorized representative execute and return one fully executed original to the CAISO by January 11, 2019.

Kindest regards,



Deborah A. Le Vine
Director of Infrastructure Contracts & Management

ACKNOWLEDGED AND AGREED: ANB

Pacific Wind Development LLC

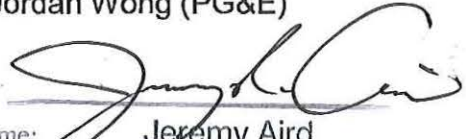
By: 

Title: _____

Date: 3 January 2019

LEGAL
IN

Cc: Jordan Wong (PG&E)


Name: Jeremy Aird
Title: Authorized Representative

Fountain Wind LLC

a Delaware limited liability company
1125 NW Couch, Suite 700
Portland, OR 92709

Pacific Gas & Electric Company
Attention: Electric Grid Interconnection – Contract Management
245 Market Street, Code N7L
P.O. Box 770000
San Francisco, CA 94177-0001

Via Overnight Courier and Email: EGIContractMgmt@pge.com

Subject: Request to recommence only Design and Engineering work on the Fountain Wind Project (Queue No. Q1106)

Dear Mr. Doleman,

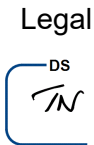
As you know, the approved suspension for the Fountain Wind Project (Q1106) ended on May 30, 2020. Fountain Wind LLC requests that PG&E recommence only design and engineering work under the Large Generator Interconnection Agreement (executed November 28, 2017) on the Network Upgrades and Interconnection Facilities so that the approved project commercial operation date (“COD”) of March 15, 2024 remains feasible.

We also request that PG&E tender an amended LGIA for the Fountain Wind Project so that the parties can negotiate new milestones to potentially advance the COD to an earlier date, including setting new dates for Appendix B milestone (b) (submittal of written authorization to proceed with the procurement and construction of the PTO’s Interconnection Facilities and Network Upgrades). We request that PG&E not commence Construction Activities (as that term is defined in the California ISO tariff) with respect to the Fountain Wind Project (Q1106) without receiving a written notice to proceed from Fountain Wind LLC.

We look forward to re-engaging with you on this project. Please reach out to Henry Woltag at 281.520.6995 or HWoltag@connectgenllc.com if you have any questions.

Sincerely,

Fountain Wind LLC, a Delaware limited liability company



DocuSigned by:
By: Sara Parsons
Name: Sara Parsons
Title: Authorized Representative

DocuSigned by:
By: Steve Krump
Name: Steve Krump
Title: Authorized Representative

Fountain Wind LLC

a Delaware limited liability company

1125 NW Couch, Suite 700

Portland, OR 92709

cc: Queue Management (via email: queuemanagement@caiso.com)
Regulatory Contracts (via email: regulatorycontracts@caiso.com)
Henry Woltag—ConnectGen (via email: HWoltag@connectgenllc.com)
Rebecca Turner—ConnectGen (via email: RTurner@connectgenllc.com)