

DOCKETED

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Interconnections for Generation Shifting where there exists Curtailment

There is not an obvious and efficient process for interconnecting a new resource adjacent to existing resources that are subject to curtailment. Our project consists of very long duration thermal storage created from inexpensive renewable electricity. This class of new resource needs a new type of interconnection not subject to the kind of coarse planning associated with LGIA. In CA, we had 600,000 MWhs of curtailment in March, 2023. A new class of interconnection type is required for independent, load shifting developers seeking to address deep decarbonization by load shifting curtailed solar.

Additional submitted attachment is included below.

Back of the Napkin Economics, Western US Wholesale Markets

**Super Low Peak, Renewables
10AM - 2PM**



**340 MWH
@ \$10 MWH**

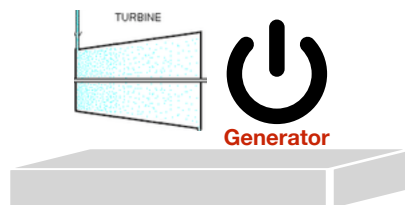


**\$3,400
Cost**

**Any Time Of Day
Up To 24 Hours**



**136 MWH
@ \$50 MWH**



**\$6,800
Sale**

NOTE:

**This example is using conservative
Western US supply and demand prices.**

**The system participates in all
California Capacity Market scenarios
with a 90% Effective Load Carrying Capacity.**

Selling price includes RA Capacity Value.

Steam Plant Efficiency = 40%.

**Energy Imbalance and Curtailed Solar
Are Basis for Cost.**

**Effectively Replaces Gas Peaker Plant Demand
with a Preferred, Renewable Resource.**