



## AWEA-CALIFORNIA COMMENTS ON THE CAISO'S 2020 DRAFT POLICY INITIATIVES CATALOG

AWEA-California appreciates the opportunity to offer comments on the California Independent System Operator's (CAISO) 2020 Draft Policy Initiatives Catalog.

As AWEA-California has suggested during the policy initiatives development process in prior years, a comprehensive review of the CAISO's Transmission Planning Process (TPP) would be beneficial and should be included in the stakeholder catalog.

Notably, an initiative reviewing the TPP, and especially the economic methodology used in the TPP, has become even more important given CAISO's recent proposal to change the Generation Deliverability Assessment methodology. While, in an announcement in February 2019, CAISO indicated that additional stakeholder engagement on the generation deliverability methodology would take place soon, AWEA-California is unclear where and when such a discussion will take place. The topic was not discussed in the Draft Study Plan for the 2019-2020 TPP nor are initiatives related to this change addressed in the 2020 Stakeholder Initiatives Catalog.

AWEA-California urges the CAISO to provide stakeholders certainty on the expected venue and timing of stakeholder engagement on the changes to the Generation Deliverability Methodology and the processes that would be affected by a change to this methodology. While it may not make sense for these initiatives to be included in the 2020 stakeholder initiatives catalog, because these processes should be initiated prior to 2020 to support a 2020 implementation of the deliverability methodology, through the stakeholder initiative catalog process CAISO should provide clarity to stakeholders on its plans for stakeholder engagement on this topic.

AWEA looks forward to continued engagement with CAISO on issues related to the Generation Deliverability Methodology, the TPP, and other key stakeholder initiatives expected to begin soon (such as the Extended-Day Ahead Market initiatives).