



California Wind Energy Association

December 1, 2015

Mr. Neil Millar
Executive Director
Market and Infrastructure Development Division
California Independent System Operator
Via email

Dear Mr. Millar,

The California Wind Energy Association (CalWEA) offers the following comment on the CAISO's planned 50% RPS Special Study as part of its 2015-16 Transmission Planning Process (TPP) as presented at the CAISO TPP stakeholder meeting on November 16, 2015. We understand that the main goal of the Special Study is to identify the magnitude of renewable generation that could theoretically be developed in various Competitive Renewable Energy Zones (CREZs), in and out of state, on an Energy Only basis without incurring significant curtailments due to reliability issues (transmission congestion).

CalWEA broadly agrees with the basic steps of the methodology that CAISO intends to use for its 50% RPS Special Study. However, as we also noted at the stakeholder meeting, we emphatically recommend that the CAISO methodology account for the complementary generation profiles of wind and solar resources when studying reliability/congestion-related renewable resource limits in CREZs that contain both wind and solar resources. We assume that CAISO shares our intuitive and logical understanding that both snapshot reliability studies and long-term production simulation studies, when properly performed, will reveal that the availability of wind and solar resources in a CREZ will raise the total renewable resource capacity limit over that of a CREZ with only wind or solar resources from a transmission reliability/congestion perspective. So, it is only befitting that this intuitive understanding should be translated to actual results based on CAISO's planned studies.

Appropriately evaluating the complementarity of wind and solar resources will further the objective of ascertaining how much renewable energy could be obtained without triggering the need for additional transmission.

If you have further questions, please contact CalWEA's Technical Director, Dariush Shirmohammadi at 310-858-1174, or myself at 510-845-5077.

Sincerely,

Nancy Rader
Executive Director