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Regional Transmission

California Independent System Operator

Submitted via email at [regionaltransmission@caiso.com](mailto:regionaltransmission@caiso.com)

**Support and Comments: Draft Final Straw Proposal, Deliverability Assessment Methodology Revisions**

EDP Renewables North America (“EDPR”) appreciates the stakeholder process leading up to the Draft Final Proposal to modify the ISO’s current Deliverability Assessment Methodology (“Final Proposal.”)

**Deliverability Assessment Methodology Comments:**

Consistent with our previously submitted comments, EDPR continues to support the proposed changes to the Deliverability Assessment Methodology. The proposed changes properly adjust the methodology to better align with changing system conditions and the timing of peak system needs. For these reasons, the proposed changes to the Deliverability Assessment Methodology itself have enjoyed broad stakeholder support.

As discussed in more detail below, EDPR strongly supports the ISO moving forward with gaining the necessary approvals for the Final Proposal in time for the upcoming 2020 reassessment.

**Off-peak Deliverability Status Comments:**

EDPR also appreciates the changes the ISO staff has made to the Off-peak Deliverability Status proposal. ISO staff clearly listened to the comments received on the earlier variations of the OPDS concept and the Final Proposal strikes a balance between the need to mitigate curtailments, avoid unnecessary transmission upgrades, encourage economic bidding, and

incentivize Off-Peak Network Upgrades (“OPNU”) where justified. EDPR appreciates that these OPNUs would be fully reimbursable and we also support the emphasis on economic bidding.

**Implementation Timing and Tariff Filing Comments:**

EDPR encourages the ISO to move forward with the Draft Final Straw Proposal on the proposed timeline, delivering it to the CAISO Board in November and seeking FERC approvals immediately thereafter, ideally in time for the 2020 reassessment. The proposed changes to the Deliverability Assessment Methodology have been under consideration since November 2018. Renewable energy developers are attempting to make sound business decisions, meet readiness requirements, and progress through the ISO’s interconnection process while managing the uncertainty around which Deliverability Assessment Methodology will ultimately be used to assess their project(s). Delaying implementation of the new Deliverability Assessment Methodology for another year, until the 2021 reassessment, will only delay the benefits of adding more renewables to the grid without unnecessary Network Upgrades.

For these reasons, EDPR encourages the ISO to recognize the importance of getting FERC approval in time for the 2020 Reassessment and consider structuring the filing in such a manner that the uncontroversial changes to the Deliverability Assessment Methodology itself could be approved on a separate timeline from the OPDS proposals, should the latter require more deliberation at FERC. In other words, the CAISO should indicate to FERC that the Deliverability Methodology changes are time sensitive and are severable from the OPDS portions of the filing, if necessary. If this is not acceptable to the ISO, EDPR respectfully requests the ISO consider all possible options and timelines to allow for the results of the 2020 Reassessment to benefit from the Final Proposal’s superior methodology for assessing deliverability.

EDPR greatly appreciates the opportunity to comment on these important proposals.

Sincerely,

**Cameron Yourkowski**

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