



GOLDEN STATE CLEAN ENERGY

Re: CAISO Generation Deliverability Assessment Methodology – revisions proposed in 2018-19 Transmission Planning Process

Golden State Clean Energy urges the California ISO to set a workshop to engage further with stakeholders related to the proposed revisions to the generation deliverability assessment methodology.

We believe that the proposed changes need to be better understood by market participants and renewable generation project developers that have already made significant investment to support the state's greenhouse gas reduction goals. We also believe that with so many moving parts this year related to the question of resource adequacy, including a significant CPUC proceeding and a significant CAISO initiative proposing many modifications to the RA framework, that also changing the deliverability methodology for RA purposes amidst the moving landscape for RA in California is premature.

CAISO notes in its presentation that "transmission congestion may increase, which would need to be addressed in the transmission planning process as policy-driven or economic-driven upgrades." (CAISO Generation Deliverability Assessment Methodology Proposal Call, December 18, 2018, slide 43.) The potential implications of the congestion caused by the CAISO revising its approach need to be well-understood. We have serious concerns about the timing of any fix to address increased congestion caused by this shift in methodology, particularly since the CAISO has not been planning its transmission grid to accommodate the increased percentage of renewable development directed by state policy. Any changes to the transmission grid are at least a decade away, so creating new congestion by altering this methodology, where it will take 10 years or more to resolve the congestion through the transmission planning process, risks causing significant unanticipated financial harm to current projects.

We are also concerned that the determination to modify the methodology seems at least in part to be driven by increased amounts of non-controllable behind-the-meter solar. (CAISO Generator Deliverability Assessment Methodology, proposed revisions posted December 12, 2018, page 2.) The policy implications of potentially shifting cost and financial consequences to large-scale, operable and controllable solar that can assist with grid support need to be examined carefully.

We request that the California ISO not proceed with implementing the changes described in its December 12 proposal without a process for careful examination of the implications and assessment of options.

Thank you for your consideration.

Daniel Kim

Vice President of Regulatory and Government Affairs, Golden State Clean Energy
dan@goldenstatecleanenergy.com

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