

## **Comments on Proposed Generation Deliverability Assessment Methodology**

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Middle River Power, LLC (“MRP”) is the asset manager for both MRP’s 830 MW High Desert Power Project and 270 MW Coso Geothermal as well as 520 MW of other assets within California and across the US. MRP is pleased to have the opportunity to submit comments on the December 18 deliverability webinar. MRP appreciates the CAISO holding a webinar on the new methodology and asks that the CAISO (1) hold an additional webinar prior to implementing the new methodology, and (2) at this webinar go into additional details on the proposal’s impact on (a) intermittent and non-intermittent resources in the queue, (b) likely impact on renewable curtailments and market congestion, and (c) impact on TPP studies.

MRP is most concerned about how the new deliverability assessment methodology will change deliverability results for resources already in the queue, and the eventual impact of the change to significantly impact congestion and curtailment in ways that market participants have not accounted for in their energy market hedging strategies and contracts. Participants in Transmission Planning meetings are frequently different than participants in market policy meetings, and MRP believes broader scope and participation is needed across the CAISO energy community before the CAISO should put the new deliverability methodology in place.

MRP asks the CAISO to hold an additional workshop in early February and implement the new deliverability methodology with the Cluster 12 Phase I study.

Thank you for considering our comments.