



November 13, 2019

CAISO BOARD OF GOVERNORS:

Ashutosh Bhagwat

Severin Borenstein

Angelina Galiteva

Mary Leslie

David Olsen, Chair

Dear CAISO Board of Governors,

EDP Renewables North America (EDPR) is a utility-scale renewable energy and storage developer actively developing multiple projects within the California Independent System Operator's (CAISO) footprint. These projects include stand-alone solar, solar plus storage, and offshore wind. I write in support of the proposed changes to the Generation Deliverability Assessment Methodology before the Board today.

EDPR has participated in the CAISO's stakeholder process discussing the proposed changes to the deliverability methodology and we very much appreciate CAISO staff's efforts to balance the diverse interests of stakeholders. As staff has noted in your Board Memo, the deliverability methodology has not been modified since 2009, a decade encompassing nearly the entire buildout of solar generation in California and significant changes to peak system needs.

The Final Proposal vastly improves the generation deliverability methodology by more accurately reflecting the resource adequacy contributions of new resources under changing system conditions. EDPR recognizes the following benefits of the proposed changes to the deliverability methodology:

- More accurately reflects the resource adequacy contribution of new resources.
- Reduces the reliance on conventional resources for resource adequacy.
- Reduces the transmission upgrade costs necessary to deliver the same amount of effective load carrying capability.
- Accommodates the near-term development of both solar generation and storage capacity.

- Helps to address California's near-term capacity concerns and the state's emission reduction goals.

Timely implementation of the deliverability methodology proposal is critical. EDPR is actively developing solar and storage projects in California and is poised to have these clean energy and capacity resources operating by 2022. If the deliverability methodology change is not implemented in time for the 2020 Transmission Plan Deliverability allocation reassessment (March 2020) the ability to contribute to the state's resource adequacy and clean energy goals within the 2022-2023-time frame is significantly jeopardized.

EDPR appreciates the Board's consideration of these comments and encourages the timely approval of the proposed deliverability methodology changes. EDPR looks forward to supporting these changes at the federal level and encourages the CAISO to be mindful of the benefits of implementing these proposed changes in time for the 2020 reassessment when drafting its filing to the Federal Energy Regulatory Commission.

Sincerely,

/s/

Cameron Yourkowski  
EDP Renewables North America LLC  
Regulatory and Market Affairs Manager – Western Region  
53 SW Yamhill Street, Portland, Oregon 97204  
Direct 503.535.0926