



GOLDEN STATE CLEAN ENERGY

November 12, 2019

David Olsen, Chair
Board of Governors
California Independent System Operator Corporation
California ISO Board of Governors

Re: Deliverability Assessment Methodology Revisions Proposal

Dear Chair Olsen and Members of the Board:

Golden State Clean Energy (GSCE) provides these comments in support of the California ISO's deliverability assessment methodology revisions proposal. GSCE is the developer of the Westlands Solar Park, the largest master planned solar and renewable energy park being developed in the United States in the heart of the San Joaquin Valley. This project is universally supported by environmental, labor and agricultural groups in California as being a model for utility-scale renewable energy development due to its smart siting, strong project labor agreement, and ability to tackle water and energy problems in the Valley.

GSCE very much appreciates the CAISO's work on this topic, not only in opening last year's proposed new deliverability assessment methodology to the stakeholder process, but also in being considerate of stakeholders' comments submitted in this initiative. We recognize that CAISO identified a need to improve its deliverability assessment methodology to conform to the new peak timeframe, and we laud CAISO's efforts here to balance that need with the desire to address the consequences of the methodology changes.

The off-peak deliverability status responds to stakeholder concerns over excessive curtailment, and the CAISO's proposal offers a solution that should give developers the ability to make choices to mitigate curtailment. GSCE does not think the proposed off-peak deliverability status is a panacea for California's long-term transmission needs to deliver renewables and meet the State's aggressive GHG reduction goals. Nonetheless, the off-peak deliverability status offers a

creative process for addressing excessive curtailment concerns in a more immediate timeframe for generation developers, and we think CAISO is right to improve the deliverability assessment methodology as a holistic initiative.

We believe that California policy offers significant support for embedding these upgrades in the generator interconnection process. The GHG reduction goals and CPUC assumptions on the amount of energy-only projects needed to meet these State policies clearly contemplate dramatically more solar being constructed in California. If these investments, which as CAISO notes ultimately are paid for by ratepayers, become more costly because they strand the megawatts from production, it will make achieving the RPS and GHG reduction goals more challenging and lead to higher electric costs for consumer.

GSCE was one of several renewable developers that urged CAISO to provide a transitional opportunity to allow existing energy-only projects to compete for an allocation of the “new” deliverability that will be available when CAISO changes its on-peak deliverability assessment methodology. Offering energy-only projects this opportunity in advance of newly-interconnecting projects is the most equitable way to address the additional deliverability that is created due to the change in methodology.

GSCE would like to thank the CAISO team for their efforts in this initiative. We believe the potential impact of the new on-peak methodology on renewable generation in California could be problematic and are encouraged by the creative thinking behind the CAISO’s proposed solution. Projects in the current queue have already made significant investment in transmission upgrades to support the State’s GHG reduction goals, and the State will continue to need renewables to be developed to meet its RPS requirements. In light of those concerns, we feel the proposal before the Board made a significant step to address curtailment and offer energy-only projects a fair opportunity to compete for a deliverability allocation.

Respectfully,

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