

**RWE Renewables Comments on CAISO's
Deliverability Assessment Methodology Initiative Draft Final Proposal
October 18th, 2019**

RWE Renewables (“RWE”) appreciates the opportunity to comment on the CAISO’s Draft Final Proposal in the Deliverability Assessment Methodology initiative. In addition, RWE supports comments submitted by LSA.

RWE has followed the various discussions regarding the Deliverability Methodology assessment and appreciates the CAISO’s initiative to improve the deliverability analyses. RWE supports the CAISO’s position to proceed with Deliverability Assessment changes. RWE supports the CAISO’s approach of full reimbursement of Off-Peak Network Upgrades (OPNUs).

One-time opportunity for certain EO/PCDS projects to access newly available deliverability

The CAISO Proposal currently does not provide a one-time opportunity for EO and PCDS projects to access newly available deliverability when their FCDS requests were denied earlier solely due to lack of area deliverability. The project with PCDS or Energy Only lost their FCDS status in the study process based on the methodology that modeled solar projects at 90-92% of their Pmax. For these projects with EO or PCDS status, the deliverability study revealed exorbitant Area and Local Deliverability Network Upgrades (ADNUs and LDNUs)

However, that is certainly not true for many projects coming out of the current interconnection-study process or Cluster 13 and beyond that will have a great opportunity to receive full deliverability awards under the new methodology with solar project modeled at 10-12% of their Pmax. The CAISO has indicated that under the new methodology the need for deliverability project will be reduced and there will be less transmission available. However, RWE agrees with multiple other stakeholders that the new technique of modeling solar will far outweigh the deliverability that will be available in future studies. Energy only projects are currently ranked very low and are unfairly disadvantaged when it comes to seeking TPD allocations.

RWE strongly recommends that the CAISO allow a one-time window for Energy Only projects (that originally requested for deliverability but lost it in the interconnection process) and PCDS projects to request deliverability under the new deliverability methodology. In order to not impact the current seven-priority structure for deliverability allocation, the CAISO could allow for a one-time option for EO/PCDS projects to have the same standing as Allocation Group 3 (if no PPA is available). These Energy Only/PCDS projects are in their advanced stages from a development, interconnection and permitting perspective and will help the CAISO/CPUC meet its reliability needs goal for 2021 with additional capacity. The one-time allowance window for EO/PCDS projects will not impact the CAISO’s timeline to propose the new methodology to the board in November 2019.