

8minute Solar Energy Comments on the September 27, 2019 Draft Final Proposal of the
Deliverability Assessment Methodology Revisions

October 18, 2019

8minute Solar Energy agrees with the comments of the Large Solar Association and other electric power generators, in particular the lack of opportunity in the Draft Final Proposal for Energy Only (EO) and Partial Capacity Deliverability Status (PCDS) projects that are in the earlier CAISO queues studied using the existing deliverability methodology to get allocated a Full Capacity Delivery Status (FCDS) allocation under the new Deliverability Assessment Methodology. If capacity will be freed up through this new methodology, as expected, those projects that did not receive FCDS because of the lack of such capacity should have the option to apply for it in the applicable highest-priority levels (Groups 1-3), instead of being relegated to Groups 4-7.

Many of these EO and PCDS projects are in advanced development, and with FCDS designation, can help meet the near-term need for Resource Adequacy (RA) that has been determined by both the CAISO and the CPUC. What's more, these are carbon-free power generation projects that can also meet the energy component of the State's GHG goals under SB100 and AB32/SB32. Lastly, because of their advanced stage, these projects are most able to replace the gas-fired Once-Thru-Cooling plants that otherwise have to be kept in operation to meet RA needs.

At least some EO and PCDS projects currently in the queue were denied FCDS because there was not sufficient deliverability capacity. Thus, it is only fair that they be able to apply for the newly available capacity. The CAISO would not have to modify its seven-priority ranking system for TPD allocation. If the EO or PCDS projects have a PPA or are short-listed, they could be included in Groups 1 and 2, respectively. If they do not, they could elect Group 3 at their option.

A straightforward eligibility determination of this application right would be to grant the right to inclusion in Group 1-3 to all projects in the CAISO queue system at the time the new methodology becomes effective, through Cluster 10.

8minute Solar Energy applauds the CAISO's creative approach to utilizing the transmission system more efficiently and appreciates the opportunity to raise these very important details in this very complex proposal.

Sincerely,

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