



GOLDEN STATE CLEAN ENERGY

June 20, 2022

Re: June 6, 2022, presentation, *On-Peak Generation Deliverability Study Generation Dispatch Assumptions*

Golden State Clean Energy (“GSCE”), the developer of the Westlands Solar Park, appreciates the opportunity to submit this comment on the recent meeting to discuss potential updates to generation dispatch assumptions in the California ISO’s on-peak deliverability study.¹ GSCE comments to (i) support this undertaking to update deliverability study assumptions, (ii) support revisions to generator dispatch assumptions that can create additional available TP deliverability on existing transmission for the 2022-23 allocation cycle, and (iii) request additional documentation be provided as part of the next steps in this undertaking.

GSCE believes that CAISO’s review of deliverability study assumptions and its willingness to revise study assumptions based on updated dispatch data is very important given the need to get new resources online in the next three years to address California’s capacity shortage. If the system can reliably support more deliverability for new resources, altering the methodology to accurately reflect the grid’s topology and free up more deliverability is important and should be done as often as needed to keep up with the changing grid. CAISO’s deliverability study has a crucial impact on California’s resource adequacy program and the RA market, so reasonable reforms to the deliverability study that can improve the RA market should be undertaken as often as needed.

In CAISO’s review of dispatch assumptions, analysis showed that storage dispatch assumptions in the Secondary System Need scenario could reasonably be reduced to better align with observed storage output during tight system conditions. By reducing dispatch assumptions for storage in the deliverability study, CAISO can create more TP deliverability on existing transmission and reduce the barrier for new storage resources to receive a deliverability allocation. GSCE supports this revision and urges CAISO to implement the change in time for the 2022-23 deliverability allocation cycle.

¹ Presentation available at: <http://www.aiso.com/Documents/Presentation-GenerationDeliverabilityStudyDispatchAssumptions-Jun062022.pdf>.

GSCE requests that CAISO create additional documentation to support this stakeholder effort, beyond the slides presented on June 6. A technical bulletin or similar report would be useful for educating stakeholders and ensuring that interconnection customers understand the implications and thinking behind CAISO's methodology changes. The document should clarify the current and changing deliverability conditions and assumptions, including any context or background that could help stakeholders better understand the deliverability study and allocation process. We are particularly interested in scenarios on how deliverability transfers will be affected by the proposed revisions.

Thank you for your consideration of this comment.

Respectfully,

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