

## **Comments of Natural Resources Defense Council on the Draft 2019/20 TPP**

NRDC appreciates the opportunity to provide comments to the CAISO on the Draft 2019-2020 Transmission Plan.

NRDC would like the CAISO to explore the 2000 MW net export limit. At the recent FERC Order 1000 Interregional meeting in Salt Lake City, there was discussion among stakeholders on how the CAISO and other FERC 1000 regions modeled export limits. CAISO has a 2000 MW restriction, while the other regions did not place this limit and discovered different findings. NRDC would like to see the CAISO dig into the data and model limitations. This limitation could be reducing benefits and driving up renewable curtailment in the region. Eliminating the export limit can result in a reduction in renewable resource curtailment and possible decreases in congestion in the CAISO footprint, which will create economic, reliability and public policy benefits to California. NRDC looks forward to working with CAISO and CPUC to re-evaluate the export limitations.

We thank the CAISO for the opportunity to submit these comments and look forward to continuing work with the CAISO.

Thank you,

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