

BAMx Comments on the CAISO Deliverability Methodology Revisions

BAMx appreciates the CAISO having a separate Stakeholder call on their proposal to revise their deliverability methodology. Revisions are clearly needed to keep the CAISO studies correlated to the maximum extent with the implementation of the ELCC methodology by the CPUC, being adopted by them in conformance with State law.

BAMx clearly sees that the CAISO proposal is headed in the right direction with their revisions to the deliverability methodology. It should provide a better indication of the capability of the existing transmission system to accommodate the renewables necessary to achieve California's policy goals.

Increased Congestion

Some Stakeholders express concern about the new methodology leading to increasing levels of generation curtailment due to congestion. BAMx agrees with the CAISO that its existing TEAM methodology provides a decent framework for that to be studied thoroughly, which would lead to transmission upgrades if they are economically justified. BAMx believes that, if according to the TEAM methodology, it is more economic for the ratepayer for the congestion to occur than no transmission additions are justified to reduce such curtailment.

Conclusion

BAMx would encourage the CAISO to implement their proposed methodology but to make a commitment to revisit it at a future date.

If you have any questions concerning these comments, please contact Moisés Melgoza (mmelgoza@svpower.com or (408) 615-6656).