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California Independent System Operator

First Solar requests that the California ISO allow for additional stakeholder engagement related to the proposed modifications of the generator deliverability assessment methodology. We believe that stakeholders should have more opportunity to understand the implications to projects currently in the queue, including those that are poised to help the state meet its increased renewables procurement targets.

While First Solar appreciates that the system has changed significantly since the CAISO first developed its deliverability assessment methodology in 2004, we believe that stakeholders would benefit from a workshop to better understand the implications of the revised methodology. The CAISO notes in its presentation slides that fewer transmission upgrades will be required for generators to achieve full capacity deliverability status, but that transmission congestion may increase. We believe that this should be examined and explained so that the methodology's assumptions and impacts on congestion are better understood, particularly given the presentation's reference to resolving any increased congestion through the transmission planning process, and the very lengthy timelines that can be involved in developing transmission solutions to congestion.

We would also like to better whether changes under way at the CPUC related to the ELCC calculation, including how storage is taken into account, would lead to any changes in the CAISO's scenario design. We are also interested in exploring whether the scenario or modeling assumptions would change if the assumptions about utility-scale solar and its operability were altered. First Solar recently engaged with E3 and Tampa Electric Company in a study that investigated the economic value of flexible solar power plant operation. The study demonstrated that utility-scale solar can be operated to reduce the impacts of variability associated with the resource, and can be found at <https://www.ethree.com/wp-content/uploads/2018/10/Investigating-the-Economic-Value-of-Flexible-Solar-Power-Plant-Operation.pdf>.

We urge the CAISO to set a workshop to allow more opportunity for stakeholders to evaluate and understand the proposed revisions to the revised deliverability assessment methodology and hold off on implementing the new methodology until that occurs.

Thank you for your consideration.

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