

January 7, 2019

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON THE PROPOSED REVISIONS TO THE GENERATION DELIVERABILITY
ASSESSMENT METHODOLOGY**

In response to the CAISO's request, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the "Six Cities") provide their comments on the proposed revisions to the Generation Deliverability Assessment Methodology.

At this time, the Six Cities' comments focus on the proposed process for modifying the current methodology, which the Six Cities understand has been in place for a number of years. The Six Cities appreciate the CAISO's rationale for proposing revisions to this longstanding methodology – namely, that changes in the resource mix and usage relative to when the original methodology was developed necessitates corresponding changes to the assumptions used by the CAISO to evaluate the deliverability of resources. It is encouraging that the CAISO believes the proposed revisions to the existing methodology may result in the identification of fewer network upgrades.

The Six Cities believe that it is worthwhile to take the time to appropriately consider and provide to stakeholders information regarding the possible implications of the proposed modifications. The CAISO has made a good start by posting a redlined version of the Generation Deliverability Assessment Methodology document and holding an initial stakeholder meeting.

At the same time, stakeholders would likely benefit from additional opportunities to consider and evaluate the potential impacts of the proposed changes. For example, although the CAISO identified that its proposed revisions could result in decreased network upgrades, the CAISO also described how increased congestion due to more resources being awarded deliverability could impact the need for policy or economic upgrades in the Transmission Planning Process. This may have a potential cost impact, because reimbursement to interconnection customers for certain network upgrade costs in the interconnection process is capped, while upgrades approved through the Transmission Planning Process are not. Additionally, during the stakeholder meeting to discuss the revised methodology, the CAISO noted potential impacts on the level of Net Qualifying Capacity for resources as a result of the change in deliverability assessment. Stakeholders would certainly benefit from additional information regarding this potential effect of adopting the CAISO's proposed changes.

Finally, the Six Cities support a further technical workshop to discuss the proposed revisions to the assessment methodology.

Submitted by,

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