



The CAISO received timely comments on the topics discussed at the June 11, 2026 stakeholder call from the following:

- A. American Clean Power –
- B. California Bay Area Municipal Transmission Group (BAMx)
- C. California Community Choice Association
- D. NextEra Energy Resources, LLC
- E. LSA
- F. Middle River Power, LLC

Comments received after the June 25 due date are not included in the comment matrix below. Copies of all comments submitted are located on the Meeting and events page under On-peak deliverability assessment methodology refinements at:

<https://www.caiso.com/meetings-events/topics/on-peak-deliverability-assessment-methodology-refinements>

The following are the CAISO's responses to the comments

1. Please provide your organization's feedback on the On-Peak Deliverability assessment redlines and June 11 meeting discussion.

No	Submitting Organization	Comment Submitted	CAISO Response
1A	American Clean Power – California	Introduction ACP-CA appreciates the CAISO's consideration of how to evolve its on-peak deliverability assessment. To understand the practical impacts of these changes on interconnection customers and queue outcomes, we recommend that the CAISO provide estimates of the expected	The 2025-2026 TPP studies demonstrated that the FCDS resources in the integrated resource plans of all local reliability authorities would be deliverable without the Serrano-Del Amo-Mesa project with approximately



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		magnitude of changes to deliverability quantities from the proposed changes, as well as further detail on when and under what circumstances the CAISO might exercise the option to model proposed resources to address local reliability constraints. 1. Please provide your organization's feedback on the On-Peak Deliverability assessment redlines and June 11 meeting discussion. A. Modeling proposed resources and addressing local reliability issues and constraints ACP-California appreciates the consideration of the proposed modifications, especially given the recent reduction in Transmission Plan Deliverability (TPD) available in the Southern California region due to the cancellation of the Serrano Del-Amo Mesa (SDM) project and the identification of a new Mira Loma–Mesa constraint, which will limit TPD availability in a number of regions even after new transmission projects (e.g., Trout Canyon–Lugo) were approved. We support the proposal to address deliverability held up by this constraint in the near term through the modeling of the 2 GW of batteries in the 2025–2026 TPP Base Case by treating these batteries as an “existing resource” in the CAISO's generation deliverability assessment. We also appreciate the CAISO clarifying that deliverability awarded based on this changed modeling approach is not contingent upon, nor can it be revoked based on, whether those storage resources come online. We recognize that, compared to a wires-based solution, this approach is likely to benefit resources in development in the Southern California Eastern, East of Pisgah, and North of Lugo regions earlier. We also appreciate the CAISO's proactive approach to addressing the challenges created by the cancellation of the SDM project by evaluating the role of batteries in providing a deliverability solution. However, we encourage the CAISO to continue to explore further solutions to address the challenges created by the SDM project cancellation, including an additional wires-based solution to facilitate broader resource deliverability.	2000 MW of in-development storage resources in the western LA Basin. This provides an estimate of the expected magnitude of changes to deliverability quantities from the proposed changes. Proposed resources may be turned on similar to existing resources, if they are identified in the resource portfolio and have been documented in the transmission planning process as meeting a local reliability need in lieu of a transmission upgrade. Proposed resources would only be modeled if there is reasonable certainty they will be completed before the deliverability they create is needed. The need for additional upgrades with the latest resource portfolios considered will continue to be evaluated in the TPP.



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		We recommend that the CAISO coordinate with the CPUC on the planning and procurement of the 2 GW of batteries that will be modeled in the deliverability assessment to help ensure they are brought online and compensated fairly and sufficiently. In general, ACP-CA supports using storage as an alternative to transmission development where feasible, but also recognizes the need to address challenges associated with storage development in certain urban areas and to further explore storage-as-transmission-asset (SATA) policy. Beyond the case of the Mira Loma–Mesa constraint, stakeholders would benefit from greater transparency regarding how storage or other “planned” resources to be turned “on” in the model will be identified and modeled to relieve transmission constraints. While we support these changes—especially as a near-term solution—ACP-California has a number of questions about the broader implementation of this approach as it relates to Integrated Resource Planning (IRP), the Transmission Planning Process (TPP), storage compensation, resource procurement needs, and deliverability awards. While we support moving forward with the changes to the deliverability methodology now, going forward, ACP-California also urges the CAISO to work with the CPUC and stakeholders to methodically work through these questions. □ Should this be an emergency, short-term solution or a broader policy trend? In any case, CAISO should continue to explore wires-based solutions ACP-California expressed concerns about the impacts of the SDM cancellation in our comments on the Draft 2025–2026 TPP, while not opposing the SDM cancellation itself. We are supportive of the modeling approach presented here as a near-term mitigation for the downstream effects of that project cancellation. However, to accommodate the 11 GW of SCE Eastern, East of Pisgah, and North of Lugo resources expected in 2035 as part of the 2025–2026 TPP Base Case, as well as the approximately 16 GW of new resources in the 2026–2027 TPP, the CAISO will likely need to approve a wires-based solution that resolves the Mira Loma–Mesa constraint and optimizes	The ISO is coordinating with the CPUC on the development of the batteries needed in the western LA Basin. The on-peak deliverability methodology document provides information on how resources are dispatched in the deliverability studies. See responses above. See responses above.



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		the value of the recently approved Trout Canyon–Lugo upgrade. Both the SDM and Trout Canyon–Lugo projects were policy-driven upgrades approved based on the TPP resource portfolios rather than the need to address a local reliability constraint. Accordingly, we encourage the CPUC and CAISO to carefully consider how any broader policy approach would balance local storage solutions with transmission investments. Local storage may provide important near-term reliability and deliverability benefits in certain circumstances, but it may not resolve the full range of constraints that a wires solution would address or fully satisfy the underlying policy-driven need. Storage may be an appropriate non-wires alternative to resolve certain requirements of the TPP, while larger-scale resource portfolio deliverability solutions will likely continue to require transmission upgrades. Thus, while we support the changes to the generation deliverability methodology, we also urge the CAISO to evaluate wires-based solutions to address the Mira Loma–Mesa constraint in the 2026–2027 TPP cycle. We also encourage the CAISO to work with the CPUC to evaluate the feasibility of portfolios with large quantities of batteries in local reliability constraint areas, noting the 7.8 GW of batteries included in the 2026–2027 Base Case portfolio for the SCE Metro area. □ How will the new resources turned on as “existing” resources be procured? CAISO’s second criterion for exercising the proposed change in the deliverability analysis is that the resources should have “a reasonable likelihood of coming online on time.” The ability of storage resources to come online “on time” will depend on timelines for siting and permitting, as well as the procurement process ultimately used. Depending on the locational requirements for these resources, as discussed below, it may be more or less challenging to rapidly site and permit new resources. We note that siting battery storage in the LA Basin is	That is considered in the coordinated integrated resource planning and transmission planning processes. See responses above. All of the battery MW capacity in the western LA basin in the current application of this methodology refinement are already in development based on the portfolio information provided.



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		becoming increasingly challenging, due to both land constraints and local opposition. We also seek more information and discussion on how these storage resources will be procured if they are highly location-specific. One option could be for the CPUC to utilize the local RA central procurement entity (CPE) to procure resources in a specific geography while sharing costs and benefits via the Cost Allocation Mechanism (CAM). This could also enable “self-showing” of resources that meet the requirements of this local procurement and have already been procured for RA or IRP purposes. ACP-California expresses caution about the CPUC authorizing utility-owned generation for this purpose, which would set a precedent of reduced competitive opportunity, but is open to competitive processes that enable build-operate-transfer or other utility-IPP partnership arrangements that could aid in project siting. We hope the CAISO will support additional discussion on procurement options and processes for these storage resources at the CPUC and in other appropriate venues. □ How will resources be compensated? The proposed methodology change would model certain resources as online even though they are still in development. This change, especially as it applies to the 2 GW of batteries in the LA Basin in question for near-term study updates, leaves outstanding questions about how these planned resources would be compensated and how CAISO can ensure they will be available to meet the reliability needs they are included in the portfolio to address. On the one hand, the criterion that a resource be “identified in the resource portfolio” (IRP) would indicate storage or generating resources procured by LSEs as capacity and energy resources, compensated under contract for those same products, and participating actively in CAISO’s energy and ancillary service markets. On the other hand, the criterion of “meeting a local reliability need in lieu of a	See response above for the one example application of this refinement. For the one example application of the refinement, the resources in the western LA Basin have contracts with LSEs that will provide compensation.



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		transmission upgrade” implies that the resource could be treated as a storage-as-transmission-asset (SATA) resource. We observe that battery storage resources compensated exclusively as SATA resources generally are not financeable, while storage selling RA and energy or operating as a dualuse resource would be. In any case, the CPUC and CAISO should evaluate the proper compensation framework for these resources with stakeholders, including revisiting dualuse opportunities for SATA resources in a CAISO stakeholder initiative. □ What resources can benefit from the deliverability increase made available by this change? Given that we understand that the proposed change in the deliverability assessment methodology was, at least in part, driven by the impacts of the SDM cancellation in the latest TPP, we also recommend the CAISO evaluate and consider expanding the resources that could benefit from this adjustment. The Mira Loma–Mesa constraint affects resources in the SCE Eastern, East of Pisgah (EOP), and North of Lugo (NOL) regions, as identified in the 2025 TPD assessment. The TPD report shows over 16 GW of resources behind the Mira Loma–Mesa constraint that could not receive TPD in the 2025 allocation. We also observe 9.7 GW of FCDS resources in Cluster 14 seeking to interconnect at Eastern SCE, EOP, and NOL POIs, while there are none in Cluster 15. However, C14 resources just had their last opportunity to secure TPD, and C16 resources will not have that opportunity until March 2028. Thus, to maximize the benefits of this new modeling approach, the CAISO should consider extending one additional TPD allocation opportunity to C14 resources behind the Mira Loma–Mesa constraint. □ Where would resources need to be sited to both address a local reliability need and a deliverability need?	Due to other constraints, there were no generators in the Eastern or East of Pisgah areas that were affected by the Mira Loma-Mesa constraint.



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		The proposed methodology change would enable resources to be counted as “existing” if they “help address a local reliability need identified in the TPP.” However, it is unclear how this local need will be defined. The CAISO’s LCR report defines the boundaries of local capacity areas and the transmission lines and substations that count as “in” or “out” for purposes of defining local capacity resource eligibility. We observe that while the 2025–2026 TPP portfolios mapped 1.9 GW of total battery storage resources in the SCE Metro area for 2035, only 413 MW of resources not in the baseline are mapped to substations qualifying as inside the LA Basin per the LCR report. Meanwhile, the 2025 TPD study identifies the Mira Loma–Mesa constraint covering a much larger area, including many POIs extending as far east as Trout Canyon and as far south as San Onofre. Assuming the 2,000 MW of battery storage referred to in relation to the SDM project cancellation is an alternative to mitigate a local reliability constraint, the CAISO should work with the CPUC to determine where those resources are expected to come online to mitigate the reliability constraint and provide for increased deliverability. B. Proposed Changes to Generation Dispatch Levels to Account for Increased Planning Reserve Margin (PRM) ACP-CA supports the proposed change in the dispatch level of existing capacity resources (reducing it from 80% to 70%) to account for the recent increase in the PRM.	Slides 59-61 of the April 15, 2026 TPP stakeholder meeting provide information about the location of the resources in the western LA Basin for the one example application of the refinement. https://stakeholdercenter.caiso.com/InitiativeDocuments/Presentation-2025-2026-Transmission-Planning-Process-Apr-15-2026.pdf
1B	Bay Area Municipal Transmission Group (BAMx)	I. Introduction and General Position The Bay Area Municipal Transmission Group (BAMx) appreciates the opportunity to comment on the CAISO’s proposed refinements to the On-Peak Deliverability Assessment Methodology (“Revised	



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		Methodology"), posted on June 4, 2026, and discussed during the stakeholder meeting on June 11, 2026. BAMx has been an active and consistent participant in the CAISO's deliverability methodology proceedings over the past decade. Throughout this engagement, BAMx's overarching position has been that the deliverability assessment methodology employs overly stringent assumptions that may trigger an excessive volume of Delivery Network Upgrades (DNUs) imposing billions of dollars in transmission costs on ratepayers without commensurate reliability benefits. BAMx notes that the Revised Methodology is presented as a redline against the August 2022 version of the methodology document. However, many of the redlined changes—including the 10% DFAX threshold for 500 kV lines, the offshore wind treatment, the SSN scope reduction, the N-2 contingency provisions (Section 6.0), and the voltage and stability requirement—were already implemented in the April 11, 2024 version of the methodology document, which incorporated the outcomes of the January 2024 Final Proposal stakeholder process. BAMx's comments below focus on the three genuinely new changes proposed in the June 2026 revision, along with BAMx's continuing concerns regarding fundamental methodology reform and governance. Finally, BAMx notes that during the June 18, 2026 Demand and Distributed Energy Market Integration (DDEMI) Track 1 stakeholder	The ISO does not know what document BAMx is referencing. The redlined methodology document posted on June 3, 2026 is a redline against the April 11, 2024 version of the methodology document. https://www.caiso.com/documents/draft-on-peak-deliverability-study-methodology-jun-03-2026.pdf



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		call, the CAISO indicated that it must maintain previously granted deliverability, which is the reason it is not allowing demand response (DR) to export unless it has gone through the Transmission Plan Deliverability (TPD) allocation process. While BAMx appreciates the CAISO's concern with preserving existing deliverability allocations, resource deliverability could be preserved and expanded by undertaking a broader, structural reassessment of the deliverability assessment methodology. The CAISO should take this opportunity to consider whether the deliverability methodology itself needs to change to better reflect the ability of generation and load resources to reliably serve CAISO peak loads. A methodology that requires the aggregate output of all in-area generation, net of local load, to be simultaneously deliverable to the rest of the CAISO Control Area, regardless of whether such conditions are remotely plausible during actual peak-load events, imposes deliverability constraints that are increasingly disconnected from real system reliability needs. As the resource mix continues to evolve and as load-side resources such as DR play a growing role in serving peak load, continuing to apply a deliverability methodology calibrated for a fundamentally different resource and load environment risks driving billions of dollars in unnecessary transmission upgrades without commensurate ratepayer benefit. BAMx urges the CAISO to initiate a holistic review of the deliverability methodology, in parallel with the refinements proposed in this initiative, so that the methodology better recognizes the reliability contributions of all resources serving CAISO peak loads on a comparable basis. II. Demand Response Modeling: Questions and Concerns	Under resource shortage conditions, all available resources need to be deliverable to load and in resource planning assessments are generally assumed to be deliverable to load. If available resources are not deliverable to load, then the loss of load probability would be higher than the target level of reliability desired by local reliability authorities. The ISO's deliverability methodology is designed to provide the minimum level of deliverability necessary under that framework. It is entirely plausible that during resource shortage conditions that are expected to occur approximately once in 10 years that the conditions studied in the deliverability methodology could occur.



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		A. The Proposed Policy Outcome Warrants Examination of Deliverability Assessment Methodology The Revised Methodology adds demand response (DR) as a new resource type in Table 4.1, with the base case dispatch instruction to "turn on within the local study area corresponding to the group of proposed full capacity resources that are the focus of the base case." The CAISO's June 11, 2026 presentation characterized this change as necessary to prevent deliverability from being "overallocated." During the June 11 stakeholder meeting, the CAISO clarified that modeling demand response in the deliverability study will effectively "occupy" deliverability—that is, DR will consume a portion of the available transmission headroom available for export out of the study area, thereby reducing the deliverability capacity available for generation resources within the study area. This clarification was not apparent from either the Revised Methodology document or the presentation slides, which described DR modeling in terms that could reasonably be interpreted as reducing net load (and thus easing the deliverability test). Instead, what appears would happen is that local generation that previously would have served load within the study area would now have less of their output assumed to serve the local load, thereby increasing the amount of their capacity that would need to be exported from the study area to retain the same level of resource adequacy capacity deliverability. BAMx has reviewed the CAISO's engineering logic and acknowledges that it follows from a power-flow perspective within the framework of the existing deliverability methodology, though that broader methodology remains in need of comprehensive review. That is, because the deliverability test checks whether all capacity in a generation zone can simultaneously deliver output to the aggregate of	DR has not been modeled in past deliverability studies and there is a concern that we could be over allocating deliverability because DR is not accounted for in the studies. Therefore, DR will be modeled in future studies to ensure that deliverability is not overallocated.



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		load after the local load absorbs a portion of that generation output, reductions in local load would increase generation exports from the local area to the aggregate of load. The CAISO's Demand and Distributed Energy Market Integration (DDEMI) Track 1 Revised Straw Proposal, also posted on June 11, 2026, confirms this assessment, stating that "deliverability is finite and shared in the ISO BAA" and that resources relying on "general load" can "reduce deliverability available to other resources."⁵ Because the design of the CAISO Generator Deliverability Study methodology requires the aggregate generation output net of load in a given area to be simultaneously transferred to the remainder of the CAISO Control Area, the proposed policy outcome becomes problematic. Even though demand response enhances system reliability by reducing peak load during stressed conditions—precisely the conditions the deliverability test is designed to assess, the CAISO's proposed modeling of DR resources that improve system reliability would reduce deliverability available for generation resources, potentially triggering additional Delivery Network Upgrades to maintain deliverability. This creates a perverse outcome: a resource that helps the system is penalized in the planning framework. CAISO should reassess the deliverability methodology so that the reliability benefits provided by all resources can be recognized on a comparable basis. Moreover, Table 4.1 appears to create an asymmetry that compounds this concern. DR consumes deliverability headroom in the base case but is not available to "scale down proportionally" with other capacity	The location of DR needs to be considered in assessing the reliability benefits that it could provide. DR in an area that has a net export of generation limited by a transmission constraint should be expected to be less beneficial than DR in an area that does not have a similar constraint. The deliverability study software develops scenarios where a small group of resources behind a potentially constrained transmission facility are available up to their study amount levels described in section 3 of the methodology



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		resources in the worst-case analysis (Steps 3–4). This means DR's impact on the test is maximized; it occupies deliverability space in the base case but cannot be backed down to create room when generators are ramped up. Unless BAMx is misconstruing the discussion during the June 11 stakeholder meeting, BAMx respectfully requests that the CAISO either correct this asymmetry or provide the engineering rationale for it. B. BAMx Requests and Position BAMx requests that the CAISO address the following before finalizing the Revised Methodology: 1. Has the CAISO quantified how many additional deliverability constraints or network upgrades would be triggered by the inclusion of DR in the study? 2. What is the engineering basis for treating DR as a supply-side resource that consumes deliverability headroom rather than as a load-side resource that reduces the need for deliverability? BAMx has significant reservations about the inclusion of DR in the deliverability study if the effect is to make the test more stringent for generation resources. BAMx has consistently advocated for reforms that would reduce unnecessary transmission upgrades triggered by the deliverability methodology. Adding DR as a resource that consumes deliverability headroom would be inconsistent with the direction of reform that BAMx believes is needed. If the CAISO proceeds with DR modeling, BAMx encourages the CAISO to demonstrate, with empirical data, that the change does not result in additional DNUs, and to	document and ramps the resources to those levels. At the same time, all existing resources on the other side of the constraint are reduced by a very small amount to maintain the overall generation level. Because of the very small change to each of the resources being reduced, whether the DR is also reduced a small amount would not significantly affect the study results. The cost of upgrading the software to also reduce the DR by a small amount in those scenarios is not warranted. The ISO does not expect any deliverability constraints or network upgrades to be triggered by the inclusion of existing DR in the study. DR is included in the NQC list, and it is counted in resource adequacy planning. It counts for both system and local resource adequacy. The fact that it counts for local resource adequacy means that the local transmission is inadequate without the DR. Therefore, the DR is being credited for helping the transmission system. See response above.



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		provide stakeholders with the specific MW assumptions and study area impacts before the methodology is finalized. III. Base Case Dispatch: Lowering the Floor from 80% to 70% A. The Proposed 70% Floor Is Not Supported by Either the LRA-Required PRM or the CAISO's Own 25% Estimate The Revised Methodology lowers the base case dispatch floor for Existing and Proposed Full Capacity Resources from 80% to 70% of Pmax. The CAISO explained during the June 11 meeting that this change reflects the increase in the planning reserve margin (PRM) from approximately 15% to approximately 25%. BAMx questions the basis for using a 25 percent PRM as the benchmark for the dispatch floor reduction. The 25 percent figure is not a regulatory requirement adopted by any Local Regulatory Authority (LRA). Rather, it is a model-derived estimate of the PRM needed to meet a 0.1 LOLE for the 2026 June-September summer months (one day with an event in ten years) reliability target, produced through the CAISO's PLEXOS probabilistic simulation and multi-hour stack analysis.⁷ BAMx understands the rationale for seeking to align the dispatch floor with the current PRM. However, the arithmetic consequences are significant and should not be overlooked. Under the prior 80% floor, the maximum ramp-up from base case to worst-case dispatch was 20 percentage points (80% to 100% of Pmax). Under the proposed 70% floor, the maximum ramp-up increases to 30 percentage points. BAMx is concerned that this larger ramp may increase the likelihood that the deliverability test will identify binding constraints that would not have been found under the prior assumptions. The CAISO's own 2026	The maximum ramp-up is still limited to the lesser of 20 units or 1500 MW.



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		Summer Assessment reports that the loadweighted average PRM across all LRARA obligations is 17.5 percent, with the CPUC—which has jurisdiction over approximately 90 percent of CAISO load—requiring an 18 percent PRM. To BAMx’s knowledge, no LRA has adopted or proposed a PRM of 25 percent for any compliance year. BAMx has several concerns with using this model-derived figure to calibrate the deliverability methodology: First, the Summer Assessment is an annual operational readiness tool, not a longterm planning standard. The CAISO describes its summer assessment methodology as having “transitioned from a solely deterministic evaluation of anticipated summer conditions to a probabilistic approach centered on operational situational awareness.” The deliverability methodology, by contrast, is a long-term planning tool that drives transmission upgrades costing billions of dollars and requiring 5–10+ years to construct. Calibrating a long-term planning methodology to an annual operational model output is inappropriate. Using the implied PRM derived from each year’s summer assessment would lead to potentially widely varying dispatch floor levels. Second, the 25 percent figure is derived from a resource portfolio that is materially broader than the set of resources subject to the deliverability test. The Summer Assessment’s portfolio includes “all energy-only co-located solar resources relied upon to charge adjacent RA-eligible batteries,” resources “contracted by entities without RA requirements, resources serving load outside CAISO, or resources that remain uncontracted,” and resources whose contributions are subject to renewable production profiles, operational constraints, and other modeling considerations. Using a PRM derived from this expansive portfolio to make the deliverability test more stringent for the narrower set of	



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		resources actually seeking deliverability status creates a logical mismatch. If the CAISO intends to align the dispatch floor with a reserve margin metric, BAMx submits that the appropriate benchmark is the actual PRM established by the LRAs— not a model-derived estimate from the Summer Assessment. Moreover, the arithmetic consequences of using 70 percent rather than 80 percent are significant. BAMx is concerned that adopting this change would increase the likelihood that the deliverability test will identify binding constraints that would not have been found under the prior or PRM-aligned assumptions, without adequate assessment of the costs and benefits of adopting such an approach. B. Compounding Effect with Demand Response The combination of a lower dispatch floor and DR consuming deliverability headroom compounds the stringency of the test. Each change independently may make the test more stringent; together, their effects could compound. A lower starting dispatch means more MW are available to ramp up in the worst-case analysis, while DR simultaneously reduces the transmission headroom available to absorb that ramp. BAMx is not aware of any analysis by the CAISO quantifying this combined effect. C. BAMx's Position	See responses above.



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		BAMx does not oppose aligning the dispatch floor with current PRM levels in principle, but CAISO should: (1) explain why 70% was selected rather than the 80% level implied by the actual LRA load-weighted average PRM of 17.5%; (2) perform and share sensitivity analyses comparing the number and severity of deliverability constraints identified under 80%, 75%, and 70% floors; and (3) analyze the combined effect of the dispatch floor change and DR modeling. IV. Proposed Resources for Local Reliability Needs (Note 2) A. A Potentially Beneficial but Ambiguous Provision The Revised Methodology adds a new sentence to Note 2 of Table 4.1: "Proposed resources may be turned on similar to existing resources, if they are identified in the resource portfolio and have been documented in the transmission planning process as meeting a local reliability need in lieu of a transmission upgrade." This provision was not present in the April 11, 2024 version of the methodology. BAMx recognizes that this provision could be beneficial if it allows generation resources that displace transmission upgrades to be treated as existing resources in the base case, potentially reducing the need for additional DNUs.	(1) The ISO has already explained why 70% was selected. BAMx acknowledges that in its comments above. (2) The resources on both sides of the constraint are started at 70% rather than 80%, and the ramp-up is still limited as described above. The 70% is more likely to decrease the number and severity of deliverability constraints than to increase them.



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		B. Concerns 1. "Reasonable Certainty" Standard Is Undefined. The CAISO's June 11 presentation referenced "reasonable certainty" that a proposed resource will be completed as a condition for this treatment, but this standard is not defined in the Revised Methodology. CAISO should adopt clear standards/criteria for determining whether a resource will be available with reasonable certainty, such as meeting clear milestones, like obtaining an executed Power Purchase Agreement, achieving financial close, or construction commencement. Without clear criteria the determination would be subject to staff discretion, a concern BAMx has raised in prior initiatives. 2. Risk of Circular Dependency. If a proposed resource is dispatched like an existing resource in the base case, it creates deliverability headroom for other generators being studied. If that proposed resource subsequently withdraws from the interconnection queue, which is a well-documented and frequent occurrence given significant queue attrition rates, the deliverability allocations premised on its presence may be unsupported. BAMx requests that the CAISO explain how it would manage this risk and whether deliverability allocations would be revisited if the proposed resource does not reach commercial operation. C. BAMx's Position BAMx conditionally supports this provision as a step toward reducing unnecessary transmission upgrades, provided the CAISO establishes clear, transparent, and consistently applied qualification criteria and addresses the circular dependency risk. Without such safeguards, this provision may be difficult to apply consistently across study cycles.	Resources identified in the resource portfolio and have been documented in the transmission planning process as meeting a local reliability need in lieu of a transmission upgrade are reasonably certain to be developed. If they were not reasonably certain then a reliability driven transmission upgrade would have been proposed instead. With the Mira Loma-Mesa constraint example, all the proposed resources in the Western LA Basin are currently in-development, based on the portfolio information provided.



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		V. The Methodology Should Be Subject to Tariff or BPM Provisions BAMx reiterates its longstanding concern that the On-Peak Deliverability Assessment Methodology is not part of the CAISO tariff and is not subject to the Business Practice Manual (BPM) change management process. This is a staff-controlled document that: • Directly drives billions of dollars in policy-driven transmission upgrade approvals. As BAMx documented in its comments on the 2025-2026 Draft Transmission Plan, the average cost of policy-driven transmission projects approved in the last five TPP cycles (since 2021-2022) has been approximately \$2.6 billion per cycle, a dramatic increase from the average of \$62 million per cycle in the preceding nine cycles. • Determines whether generation resources can obtain Full Capacity Deliverability Status (FCDS) or Partial Capacity Deliverability Status (PCDS) for resource adequacy purposes, directly affecting the RA market and procurement costs for California load-serving entities. • Affects the cost allocation for Delivery Network Upgrades in the generation interconnection process, which is ultimately borne by transmission ratepayers.	The comment is noted.



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		The current refinement process illustrates the concern. The CAISO posted a redline document against the August 2022 version that commingled changes already implemented in April 2024 with the three genuinely new proposals, making it unnecessarily difficult for stakeholders to identify what are the actual proposed changes to current CAISO practices. The three genuinely new changes were identifiable only by conducting a line-by-line comparison of the June 2026 draft against the April 2024 version—a comparison the CAISO did not provide. BAMx respectfully suggests that providing a redline against the most recent operative version of the methodology—rather than the August 2022 version—would facilitate more productive stakeholder engagement. Furthermore, the CAISO is alone among the major organized markets in maintaining its generation deliverability methodology entirely outside of either tariff or BPM governance. Each of PJM, MISO, NYISO, and ISO-NE has codified its generation deliverability methodology in either its FERC-approved tariff or in formal Manual/BPMbased governance subject to FERC oversight. For instance, PJM codifies its generation deliverability procedure in Manual 14B (Section 2.3 and Attachment C) and its resource adequacy methodology in Manual 20A; PJM Manuals are formal governance documents subject to a defined stakeholder change-management process, with material changes filed with FERC.¹³ Similarly, MISO codifies the binding framework in Tariff Attachment X (Generator Interconnection Procedures) and Tariff Module E-1 (Resource Adequacy), with implementation detail provided in BPM-015 (Generation Interconnection, Appendix C: MISO Generation Deliverability Study Method) and BPM-011 (Resource Adequacy).¹⁴ In summary, BAMx recommends that the CAISO incorporate the deliverability assessment methodology into the CAISO tariff or, at a minimum, subject it to the BPM change management process,	BAMx is mistaken on this point. See response above.



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		ensuring that changes are subject to formal stakeholder review, a comment-and-response matrix, and, where appropriate, FERC review.	
1C	California Community Choice Association	Please provide your organization's comments on the following issues and questions. 1. Please provide your organization's feedback on the On-Peak Deliverability assessment redlines and June 11 meeting discussion. The California Community Choice Association (CalCCA) is deeply concerned with the California Independent System Operator's (CAISO) Draft On-Peak Deliverability Assessment Methodology refinements, from both a substantive and procedural perspective. CalCCA therefore recommends the CAISO pause finalizing the proposed refinements and instead hold a stakeholder process to allow stakeholders to provide meaningful input on the proposed refinements and to propose additional refinements necessary to address potential flaws with the deliverability assessment methodology. The CAISO proposes the following changes to the on-peak generator deliverability assessment methodology, among others: (1) modeling demand response (DR); and (2) considering a higher planning reserve margin (PRM) in the base case dispatch. While CalCCA agrees DR should be modeled in deliverability studies, the CAISO has not demonstrated that the way in which it proposes to model DR is necessary or appropriate. Specifically, the CAISO's method appears to stem from a concern that increased DR in local areas could strand deliverable resources. Based on conversation between the CAISO and CalCCA, it is CalCCA's understanding that the inclusion of DR is not necessarily to limit or reduce deliverability but to examine the manner in which increased amounts of behind-the-meter storage used as DR is impacting the ability to export local area resources to loads outside of the local area. While CalCCA agrees that this gathering of information is necessary to inform the CAISO of grid reliability and deliverability, it is not clear how the inclusion in the test used to assess deliverability	(1) Modeling existing demand response in the deliverability studies is not expected to trigger new upgrades. (2) reducing the starting generation dispatch on both sides of the potential deliverability constraints is more likely to increase available deliverability than not.



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		will impact currently interconnecting resources. If the effort is simply to gain an understanding, then it seems that the CAISO could gain that understanding by running a sensitivity analysis in addition to the deliverability assessment. By doing so, entities could be assured that the sensitivity will not impact the outcomes at this time. Once the sensitivity is complete, then the CAISO can assess whether other measures are necessary. In addition, the CAISO proposes to decrease base case resource dispatch assumptions from 80 percent to 70 percent based on an "increased [PRM]." This proposed change is inconsistent with the RA program and Local Regulatory Authorities' (LRA) established PRMs. The CAISO references the 25 percent PRM identified in its Summer Reliability Assessment as a justification for this change. However, the California Public Utilities Commission (CPUC) has not adopted this PRM and stakeholders have not had a chance to vet the CAISO's proposed PRM, to place alternative LOLE studies into the record, or to propose alternative PRMs. In addition, the PRMs used for the RA program are based on a 1-in-2 demand forecast, while the deliverability study is based on a 1-in-5 demand forecast. These discrepancies signal the need for additional process for stakeholders to understand and weigh in on the refinements proposed and their interactions with the RA program. This process should occur before implementing changes that would place a higher burden and additional cost responsibility on DR and/or resources seeking deliverability. The CAISO's proposed refinements reveal potential flaws with the CAISO's deliverability assessment methodology but offer stakeholders no opportunity beyond these comments to provide feedback on the merits of the proposed refinements. The CAISO should therefore pause finalizing the proposed refinements and instead hold a stakeholder process to allow stakeholders to provide meaningful input on the proposed refinements and propose additional refinements necessary to address these fundamental flaws.	The proposed refinements are expected to increase deliverability available to new resources at no additional cost.



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		Alternatively, the CAISO could maintain the current deliverability process while conducting a sensitivity analysis including DR and PRM impacts. This sensitivity would help to inform the CAISO and stakeholders regarding any necessary further actions.	
1D	NextEra Energy Resources, LLC	NextEra Energy Resources, LLC, ("NextEra Energy Resources") appreciates the opportunity to provide comments on CAISO's Generator On-Peak Deliverability Assessment Methodology for Resource Adequacy Purposes. NextEra Energy Resources appreciates CAISO's diligence in reconsidering the on-peak deliverability methodology in light of the recent Del Amo – Mesa – Serrano 500kV transmission line cancellation and the resulting Mira Loma-Mesa Deliverability constraint. As discussed in further detail below, while NextEra Energy Resources supports CAISO's proposal to model resources identified in the Transmission Planning Processes (TPPs) to alleviate constraints, questions remain regarding the practical implementation of this modeling methodology. Under the proposed On-Peak Deliverability base case modeling changes, CAISO refines its study methodology to allow future generation resources identified in the TPP as solutions to local reliability needs to be dispatched in the base case like existing resources. Under the current methodology, proposed resources are not modeled unless they amplify the constraint being studied. CAISO's proposed changes would allow future resources to be dispatched similarly to existing resources if it is documented in the transmission plan to help alleviate local reliability needs. In the near term, NextEra Energy Resources recognizes that this proposed change would, from a modeling perspective, contribute to alleviating the recent Mira LomaMesa constraint resulting from the Del Amo – Mesa - Serrano 500kV transmission line cancellation in the 2025-2026 TPP.4 Conceptually, with the CAISO's proposed	



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		methodology change, the approximately 2,000MW of batteries in the approved 2025-2026 TPP used to address local reliability issues in the West LA Basin area will be modeled in the base case to be dispatched west of the constraint and therefore reduce load on the Mira Loma-Mesa constraint. This approach would create additional transmission plan deliverability (TPD) headroom for interconnection queue positions east of the constraints. NextEra Energy Resources appreciates CAISO's proposal but has questions regarding implementation. For in-queued resources, this methodology refinement may result in increased TPD allocations for in-queued projects east of the Mira Loma-Mesa constraint (e.g. in the 2027 TPD Allocation Study). However, NextEra Energy Resources seeks clarification on CAISO's recourse if the approximately 2,000MW of batteries within the 2025-2026 TPP do not materialize. For example, what will occur if the 2,000MW of batteries don't come online, but in-queued projects are allocated TPD in the 2027 TPD studies based on the refined modeling assumptions? To ensure proper implementation, CAISO should clarify that projects allocated TPD based on the proposed refinements will not have their deliverability revoked in the scenario that 2,000MW of batteries identified in the 2025-2026 TPP fail to achieve commercial operation. NextEra Energy Resources urges CAISO to work closely with the California Public Utilities Commission (CPUC) to monitor and track the batteries in the West LA Basin area to help ensure the approximately 2,000MW of batteries identified in the 2025-2026 TPP come online in a timely manner. Specifically, CAISO should encourage the CPUC to consider a procurement order with tracking mechanisms to increase the likelihood that the 2,000MW batteries reach commercial operation date (COD) by 2035.	Slides 59-61 of the April 15, 2026 TPP stakeholder meeting provide information about the location of the resources in the western LA Basin for the one example application of the refinement. https://stakeholdercenter.caiso.com/InitiativeDocuments/Presentation-2025-2026-Transmission-Planning-Process-Apr-15-2026.pdf All these resources are identified as in-development. The ISO is coordinating with the CPUC to ensure that these resources continue in their development process or are replaced with newly procured resources. The entire transmission planning process is dependent on approved projects being completed. If an approved project fails to be completed, then the transmission and resource plans need to be updated.



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		In addition, CAISO should prioritize evaluating transmission wire solutions in future TPP cycles in the event that the planned batteries do not come to fruition. For example, NextEra Energy Resources has previously recommended that CAISO consider an additional fourth underground cable as part of the Mira Loma-Mesa 500kV underground third cable upgrade from the 2022-2023 TPP. This upgrade can increase the normal rating from 2,536 MVA to 3,421 MVA to provide system flexibility should the batteries fail to come online. This approach would ensure that the system can actually provide TPD to interconnection queue positions that receive TPD allocations under this refinement. NextEra Energy Resources also understands that this methodology change may create additional TPD zones for the purposes of interconnection intake for Cluster 16. CAISO should continue to identify policy refinements in the Interconnection Process Enhancements initiative to ensure that the deliverability available at the time of queue entry will still be available once Cluster 16 is eligible to seek TPD.	The comment is noted.
1E	LSA	LSA appreciates the opportunity to comment on the CAISO's proposed changes to the On-Peak Deliverability Assessment Methodology. LSA's comments follow the CAISO's list of changes, shown below, along with LSA's "translation" based on the discussion at the June 11 th meeting and summaries of LSA positions. The remainder of this document explains LSA's positions in more detail. (Table continued on next page.) PROPOSAL TRANSLATION FROM MEETING LSA POSITION SUMMARY Model proposed resources identified as	



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		needed to meet local reliability needs Model proposed resources in Local Regulatory Authority portfolios but not yet on-line, in locations where they could help relieve constraints, where CAISO is “highly confident” that they will develop Supports the CAISO proposal but: - The proposal should include all such resources (in all locations) in LRA portfolios that CAISO is highly confident will materialize. - CAISO should clearly state criteria for determining which resources are highly likely to develop. Model demand response Model existing demand response resources only, and only where it would adversely impact deliverability for the generators under study Demand-side resources should be modeled on the same basis as supply-side resources, i.e. - Both existing and proposed resources should be modeled (in all locations) if they are in LRA portfolios and CAISO is highly confident that they will develop - CAISO should clearly state criteria for determining which demand resources are highly likely to develop. Consider increased planning reserve margin in base case dispatch Reduce resource dispatch operating levels, since the higher reserve margin means that each resource would operate at lower average levels LSA supports this proposal in concept, with some clarifications. Model proposed resources identified as needed to meet local reliability needs As clarified in the June 11th meeting, the CAISO intends here to model proposed resources in Local Regulatory Authority (LRA) portfolios but not yet on-line, in locations where they could help relieve constraints,	The criteria for determining which resources are highly likely to develop is based on resources identified in the resource portfolio and have been documented in the transmission planning process as meeting a local reliability need in lieu of a transmission upgrade.



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		where CAISO is “highly confident” that they will develop. The Mesa-Mira Loma constraint situation is the most prominent current example, but this approach would be taken in other areas also where the criteria are met. This is a sensible approach in general. The CAISO uses these portfolios in transmission planning, and it makes sense even in a conservative approach to assume that, since they are needed for reliability, an alternative solution would be implemented if these resources do not develop. Adding the criteria that CAISO must have strong evidence that these resources will actually develop gives another layer of security that the deliverability awarded will actually materialize. However, though LSA developers have a strong interest in obtaining the additional deliverability this change could provide, we also have a strong interest in avoiding an unfortunate “NQC haircut” situation for all the resources impacted by the resulting constraint if only proposed resources that would favorably impact deliverability are included. Instead, we recommend a more even-handed and consistent approach, i.e., model proposed resources in LRA portfolios that are highly likely to develop, but in all locations where proposed, whether or not the impact would be favorable. LSA hopes such resources would normally help relieve otherwise applicable constraints, or certainly not worsen them, but if resources meeting these criteria happen to have an adverse impact, that should be accounted for as well. In addition, the CAISO should specify the criteria it will use to determine whether these resources are “highly likely” to develop, to the extent possible. Some CAISO discretion can be included in those criteria, but there should be clarity and transparency in advance about how the CAISO will make these decisions. Model demand response	All existing and proposed FCDS resources contributing to increasing flow through the constraint are modeled. See response above.



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		It was apparent from the discussion at the June 11th meeting that the CAISO intends to include existing demand-response programs only, and only in areas where it could have an adverse impact on deliverability for the generators under study. Generally, demand response, as “negative generation,” should be treated like other resources. For example, if CAISO decides to model proposed supply-side resources in locations that could mitigate deliverability constraints, if they are in LRA portfolios and highly likely to develop, then CAISO should do the same for proposed (not just existing) demand-response resources. In other words, like our recommendation for supply-side resources, LSA recommends modeling those resources in all locations where they appear in the portfolios and are highly likely to develop. Finally, as with supply-side resources, LSA recommends that the CAISO publish criteria for determining whether demand-side resources are “highly likely” to develop. Consider increased planning reserve margin in base case dispatch The connection between the level of the “planning reserve margin” and the level of resource dispatch in the deliverability assessments was not clear in the Proposal. LSA assumes from the discussion at the June 11th meeting that the concept here is that, with plentiful available resources, the overall dispatch level for each resource could be lower on average while still meeting demand, though the connection between the reserve margin and the specific proposed dispatch levels should be better explained. That approach seems sensible generally. However, there seemed to be some confusion about the applicable “planning reserve margin.” That term (PRM) usually refers to LRA-approved planning resource	Modeling proposed DR could be a future refinement. DR amounts have not changed much in previous years.



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		levels above peak demand, but the CAISO reference its own Summer Assessment during the June 11th call and not any LRA decisions. Also, the connection between the applicable reserve-margin level and the modeled dispatch levels suggested is not clear and requires additional explanation from the CAISO.	As described in the deliverability methodology paper, all existing units and proposed units in the study area are dispatched at the same percentage of their Pmax in the starting base case, but this level may fluctuate to account for differing expectations of system-wide forced outages, retirements, and planning and operating reserve levels.
1E	Middle River Power, LLC	Middle River Power, LLC ("MRP") appreciates the opportunity to provide comments for the On-Peak Deliverability Assessment Methodology Refinements. MRP generally supports the idea of modeling planned resources that can alleviate and resolve constraints affecting groups of generators that are studied. However, MRP believes the CAISO should only do so when planned resources have reached certain milestones and not simply when a resource is submitted as planned. This would ensure that resources seeking deliverability don't receive full capacity deliverability status ("FCDS") and the planned resources withdraws from the queue. The planned resource should at a minimum have started construction and track towards the completion date of the project. If the planned resource is delayed to reaching commercial operations date, then the other resources which depend on the planned resource should have their FCDS postponed as well. With regards to the base case dispatch, MRP believes the 25% planning reserve margin ("PRM") that is referenced by the CAISO is inaccurate. In the 2026 summer loads and resources assessment report, the CAISO notes that an estimated 25% PRM was needed to maintain 0.1 LOLE, however the load-weighted PRM for LSE monthly RA obligation is only 17.5%. Since LSEs are not required to procure at 25% on a monthly basis, the CAISO should not decrease base case dispatch from 80% to 70% as the evidence does not support this methodology change. MRP looks forward to further engagement on this methodology change.	See responses above On-peak deliverability studies focus on the summer peak load condition. The ISO has historically dispatched existing resources and proposed units in the study area at 80% in the starting base case. The CPUC PRM has increased to an effective PRM of 22.5% which indicates an increase in PRM from the past. The ISO has estimated that a 25% PRM was needed to maintain 0.1 LOLE, and this also indicates an increase in PRM from the past. The ISO decrease in the level of dispatch in the starting base case is directionally correct. A decrease in this level is more likely to increase the amount of deliverability available.



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