



Stakeholder Comments Template

On-Peak Deliverability Assessment Methodology Refinements

This template has been created for submission of stakeholder comments on the On-Peak Deliverability Assessment Methodology meeting that was held on June 11, 2026. The Stakeholder meeting presentation and other information related to this initiative may be found on the [miscellaneous meeting webpage](#) and the June 11 calendar event on the [public calendar](#).

Upon completion of this template, please submit it to ISOStakeholderAffairs@caiso.com.

Submissions are requested by close of business on **June 25, 2026**

Submitted by	Organization	Date Submitted
<i>Lauren Carr, Senior Manager of Regulatory Affairs and Market Policy</i>	<i>The California Community Choice Association (CalCCA)</i>	<i>June 25, 2026</i>
<i>Eric Little, Director of Market Design</i>		

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 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.

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.