



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>(submitter name and phone number)</i>	<i>(organization name)</i>	<i>(date)</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.

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 11th 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 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: <ul style="list-style-type: none"> • 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. <ul style="list-style-type: none"> • 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.
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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, 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

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 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.