

On Peak Deliverability Methodology
Due Date: June 25, 2026
Company: 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%.¹ 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.

¹ <https://www.aiso.com/documents/2026-summer-loads-and-resources-assessment.pdf> at p 13