



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>Jasmie Guan Senior Manager, Regulatory Affairs (West) c. 415. 350.9073</i>	<i>NextEra Energy Resources, LLC</i>	<i>June 25, 2026</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.

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.¹ As discussed in further detail below, while NextEra Energy Resources

¹The 2025 -2026 CAISO Board Approved Transmission Plan canceled Del Amo – Mesa – Serrano 500kV project due to cost escalation, noting that resource portfolios have approximately 2,000MW of additional battery storage downstream to meet the reliability needs. As a result, the 2025 Transmission Plan Deliverability (TPD) Allocation Report identified a new Mira Loma-Mesa area constraint.

See CAISO Board Approved 2025 – 2026 Transmission Plan, pp. 108-109, May 19, 2026. Available at: <https://stakeholdercenter.caiso.com/InitiativeDocuments/Board-Approved-2025-2026-Transmission-Plan.pdf>; CAISO, 2025 TPD Allocation Report, p. 60, April 13, 2026. Available at: <https://www.caiso.com/documents/2025-transmission-plan-deliverability-allocation-report.pdf>.

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.² Under the current methodology, proposed resources are not modeled unless they amplify the constraint being studied.³ 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 Loma-Mesa constraint resulting from the Del Amo – Mesa - Serrano 500kV transmission line cancellation in the 2025-2026 TPP.⁴ Conceptually, with the CAISO's proposed 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

² CAISO. Draft Generator On-Peak Deliverability Assessment Methodology (for Resource Adequacy Purposes), p. 8, June 3, 2026. Available at: <https://www.caiso.com/documents/draft-on-peak-deliverability-study-methodology-jun-03-2026.pdf>

³ CAISO. Generator On-Peak Deliverability Assessment Methodology (for Resource Adequacy Purposes), p. 8, April 11, 2024. Available at: <https://www.caiso.com/documents/on-peak-deliverability-assessment-methodology.pdf>

⁴ CAISO Board Approved 2025 – 2026 Transmission Plan, pp. 108-109. May 19, 2026. Available at: <https://stakeholdercenter.caiso.com/InitiativeDocuments/Board-Approved-2025-2026-Transmission-Plan.pdf>

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.

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.⁵ 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.

⁵ See NextEra Energy Resources Comments on the 2025-2026 Draft Transmission Plan, April 29, 2026. Available at: <https://stakeholdercenter.aiso.com/Comments/AllComments/e00ad194-05b0-4a66-887a-9c2d2aecc53d#org-15852765-c502-4c36-b44f-673d24322f94>