



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.

| Submitted by | Organization | Date Submitted |
|----------------------|--------------|----------------|
| <i>Igor Grinberg</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.

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on CAISO’s proposed refinements to the On-Peak Deliverability Assessment methodology. We support CAISO’s efforts to evolve generation deliverability frameworks to better reflect actual system conditions and resource performance during on-peak periods. At the same time, several elements of the proposed refinements would benefit from additional clarification by the CAISO and further stakeholder discussion prior to finalization.

Request for Clarification

PG&E requests additional detail on the following aspects of the proposal:

- **Treatment of Demand Response in Modeling:** PG&E requests clarification on the proposed treatment of DR and whether the new assumptions may unintentionally create additional deliverability constraints and associated transmission upgrades that would not arise under actual operating conditions. As

currently understood, incorporating DR as modeled in the proposal could reduce local load in study assumptions while simultaneously increasing the amount of generation required to be exported from the study area, thereby tightening deliverability constraints. This dynamic raises several related questions:

- Whether the proposed modeling approach may artificially create deliverability deficiencies that would not manifest in actual system operations?
- Whether existing assumptions overstate the need to maintain export capability from load pockets under peak conditions?
- Whether the proposed framework appropriately reflects how flexible load and DR resources operate in practice during system stress events?

PG&E requests that CAISO provide further explanation, supporting analysis, and illustrative examples to demonstrate that the proposed treatment of DR does not result in overly conservative outcomes or unnecessary transmission upgrade identification in increase deliverability.

- **Proposed Reduction in Generator Dispatch Floor (80% to 70%):** PG&E requests further explanation and supporting analysis regarding the proposed reduction in the minimum dispatch level for deliverable generators. While this change may partially offset more restrictive effects associated with other elements of the proposal (including DR modeling assumptions), CAISO has not provided a quantitative assessment of the incremental deliverability enabled by this adjustment. Absent such information, the net impact of the combined proposals remains unclear.
- **Use of a 25% Planning Reserve Margin Assumption:** PG&E requests clarification on the basis for adopting a 25% planning reserve margin (PRM) in the on-peak deliverability assessment. The proposal does not provide a clear justification for this value, and it appears substantially higher than current assumptions used in the current CPUC Resource Adequacy proceeding (approximately 18%), as well as other planning and reliability assessments. Additional explanation is needed to understand the rationale for this divergence and its implications for deliverability outcomes.

Request for Additional Stakeholder Engagement

Given the potential implications of these changes for transmission planning, load-serving entities, and resource developers, PG&E recommends that CAISO (1) provide additional examples, sensitivities, and illustrative case studies demonstrating the impacts of the proposed refinements under a range of system conditions and (2) hold additional stakeholder working sessions to walk through the methodology, assumptions, and expected outcomes in greater detail.

CAISO – Public On-Peak Deliverability Assessment Methodology Refinements

These additional steps would help ensure stakeholders have a clear understanding of the proposal and its impacts and support the development of a durable and well-vetted framework.

PG&E appreciates CAISO’s continued engagement on deliverability framework enhancements and looks forward to working collaboratively to refine the proposal. Additional clarification and stakeholder dialogue will be important to ensure the final methodology is transparent, well-understood, and implementable.