

The CAISO received comments on the topics discussed at the June 26, 2024 stakeholder call from the following:

A. California Wind Energy Association (CalWEA)

1. Please provide a summary of your organization's comments on the Deliverability Assessment Dispatch Methodology update for solar and wind Stakeholder Meeting

| No | Submitting Organization | Comment Submitted | CAISO Response |
|----|-------------------------|---|--|
| 14 | CalWEA | CalWEA encourages CAISO to establish wind and solar dispatch levels consistent with the monthly exceedance levels adopted by the CPUC after a stakeholder process. In previous CalWEA conversations with CAISO staff, staff acknowledged that its chosen exceedance levels (e.g., 20% for HSN hours) were selected arbitrarily, and no particular justification was offered during the June 26 workshop. In contrast, in accordance with CPUC Decision 23-04-010 (April 7, 2023), the CPUC's Energy Division developed a clear, replicable method for choosing exceedance levels while prioritizing higher-risk hours, namely by implementing a mean-squared error approach for each season. In Decision 24-06-004 (June 20, 2024), the CPUC adjusted exceedance levels for wind and solar resources to a monthly, rather than seasonal, level to "improve accuracy." (See p. 44) CalWEA encourages CAISO to similarly adopt exceedance levels that more accurately represent the reliability contributions that wind and solar make to the grid by recognizing the levels adopted by the CPUC. | The ISO deliverability methodology assesses the deliverability of resources during summer peak load stressed system conditions (e.g. when resource shortages are most likely to occur). It is not an hourly or a monthly analysis. As stated during the 2023 and early 2024 Deliverability M ethodology Review initiative stakeholder meetings, the general design objective of the deliverability methodology is to ensure that available resources in a generation pocket are deliverable 80% of the time during resource shortage conditions. This is implied by footnote 5 in the Deliverability M ethodology document. https://www.caiso.com/documents/on-peak-deliverability-assessment-methodology.pdf That is the basis for the 20% exceedance for HSN hours. A comparison of the most recent hourly and monthly values used in the CPUC based resource counting analysis, and the ISO's deliverability analysis reveals that the values are reasonably consistent. The ISO will continue to monitor these values. |