

From: Nancy Rader <nrader@calwea.org>
Sent: Wednesday, July 10, 2024 12:54 PM
To: regionaltransmission@caiso.com
Subject: Comment on Deliverability Assessment Dispatch Methodology update for solar and wind

CalWEA offers the following comment on the proposed Deliverability Assessment Dispatch Methodology update for solar and wind:

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.

Thank you,
Nancy

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