

California Wind Energy Association
Comments on Stakeholder Meeting on 9/23 and 9/24
2026-2027 Transmission Planning Process

Comments on Energy-Only Resources Assessment Preliminary Findings
[as uploaded into CAISO portal]

October 8, 2026

CalWEA appreciates CAISO's preliminary assessment of EO resources' ability to charge storage facilities during off-peak load periods, which showed no curtailment resulting from dispatching EO solar resources in 29 of 42 Study Area/operating-condition combinations, including all three modeled conditions—P0, P1, and P7—in seven of the 14 Study Areas containing EO solar.

This favorable result occurred despite three unduly conservative study parameters that CAISO confirmed were employed on the stakeholder call in response to a question. Those study parameters were:

- (1) The selection of the most constrained off-peak hour—11 AM on a high system need (HSN) load day—to represent over 90 percent of off-peak load hours during the year,
- (2) The assumption that storage resources must be charged at full charging capacity (storage resources have 20 hours to be charged for their 4-hour discharge obligation), and
- (3) The use of a dispatch scenario that contradicts CAISO's own operating SCUC/SCED unit commitment/dispatch protocols by assuming that dispatchable (e.g., thermal) FCDS resources were dispatched at very high output during an off-peak hour when no-cost and emission-free solar output

from EO resources were available to be used by the system but were curtailed by CAISO's selected dispatch.

To properly assess the ability of various resources to meet system demand (system load plus storage charging needs) at any selected off-peak load hour, the assessment should be conducted under more operationally representative conditions whereby dispatchable (e.g., thermal and hydro) FCDS resources are dispatched at a level determined by the CAISO's SCED algorithm. At a minimum, CAISO should justify its selection of such unrealistic study conditions.

In addition, the study should:

- Consistent with the next steps identified on slide 316, report for each Study Area and P0, P1, and P7 condition the extent of curtailment of EO resources' output for each study/contingency combination. If the extent of curtailment is limited, EO resources can be presumed generally to reach load during most off-peak hours that constitute the overwhelming majority of the 8760 annual hours.
- Focus on determining whether any storage resources, due to their unique location, are unable to accept service during off-peak system conditions.

CalWEA urges CAISO to properly weigh a low-risk strategy of enabling EO-resource charging of storage to unlock substantial benefits, including:

- Bolstering system reliability by (a) ensuring that storage resources will be fully charged and ready to contribute GHG-free energy to the grid during on-peak hours; and (b) using EO resources that can be brought online relatively quickly and at lower cost because they generally do not require major deliverability transmission upgrades that are slow to materialize.
- Increasing the ability of load-serving entities to meet unprecedented and challenging near-term resource requirements to meet grid reliability requirements and greenhouse gas targets. Furthermore, allowing EO resources to charge storage may be the *only* near-term pathway to achieving the Commission's reliability and GHG objectives given transmission delays associated with FCDS charging resources.
- Saving ratepayers considerable transmission upgrade costs by using EO resources to charge during off-peak periods, which will also foster a more robust and competitive market.

Even under CAISO's assumed conservative stress-case conditions, its preliminary study results show that EO generation in many areas should be eligible as charging resources without limitation. This may be shown to be true also for most resources under reasonable operating conditions. Any remaining resources may warrant appropriate limits or derated charging capacity.