

# California Community Choice Association

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## Contact

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### **1. Please provide a summary of your organization's comments on the Generation Deliverability Methodology Review stakeholder call.**

The California Community Choice Association (CalCCA) supports the California Independent System Operator (CAISO) conducting a review of its deliverability study methodology. Timeliness and availability of deliverability is critical in advancing new resource development. The state will need to build and interconnect 175,000 megawatts (MW) between 2027 and 2045 to achieve the California Energy Commission's (CEC) Senate Bill (SB) 100 Core Scenario. This will necessitate a per year build rate of over 7,000 MW – an increase of 557 percent from historical rates of annual new capacity additions. The CAISO's primary focus of this effort should be on how to accelerate the availability of deliverability to support these new capacity additions.

Integrated Resource Plan (IRP) procurement orders and the Resource Adequacy (RA) program require load-serving entities (LSEs) to meet their obligations with fully deliverable resources. When the CAISO finds that transmission system upgrades and/or network upgrades must take place to make projects deliverable, Community Choice Aggregators (CCAs) and project developers rely on an investor-owned utility's (IOU's) timing and ability to make those upgrades. The upgrades can be costly, take many years, and as a result, often stall projects from moving forward to commercial operations. CCAs have identified delays in online dates due to both interconnection queue delays and IOU interconnection and transmission upgrade delays. Therefore, CalCCA is interested in further exploring the seven modifications presented in the Issue Paper, especially those that can increase the amount of available RA supply by providing interim deliverability status to projects with network upgrades in progress. CalCCA is also interested in exploring how to accelerate the necessary transmission system and network upgrades to more quickly expand the amount of deliverability available. In its review of the deliverability methodology, the CAISO must assess the impacts of any identified changes to the methodology to ensure such changes will accurately provide resources with deliverability without unnecessarily disadvantaging available resources and without compromising the level of reliability planned for through the RA program.

CalCCA looks forward to providing more specific comments on the seven modifications outlined in the Issue Paper after more fully evaluating each one.

### **2. Provide a summary of your organization's comments on the on-peak deliverability assessment methodology, as described in the issue paper.**

CalCCA has no additional comments at this time.

**3. Provide a summary of your organization's comments on the off-peak deliverability assessment methodology, as described in the issue paper.**

CalCCA has no additional comments at this time.

**4. Provide a summary of your organization's comments on the proposed scope, key issues summarized by the ISO, and timeline of the Generation Deliverability Methodology Review initiative.**

CalCCA has no additional comments at this time.