



Response. AWEA's support is not dependent on FERC's approval of the curtailment priority provisions, which CAISO described in Section III.C. of its transmittal letter for the original Deliverability Enhancements Filing. Additionally, AWEA continues to support CAISO's amended Filing, in which CAISO has removed the proposed one-time deviation for Transmission Plan Deliverability ("TPD") allocation (as detailed in in Section III.D. of CAISO's transmittal letter for the initial Filing). Accordingly, AWEA urges the Commission to accept CAISO's Filing, as amended by the Deficiency Letter Response.

## **I. COMMENTS IN SUPPORT**

The previous AWEA Comments outlined the various reasons that AWEA supported CAISO's Deliverability Enhancements Filing; these points are not reiterated herein.<sup>6</sup> AWEA continues to support CAISO's Filing, as amended by the Response to the Deficiency Letter and urges the Commission's timely approval of the Filing, even if the Commission does not approve every aspect of the Filing.

CAISO's Deficiency Letter Response includes one substantive amendment to the original Filing. Due to timing constraints that arose when the originally requested effective date of March 3, 2020 passed, CAISO has eliminated the one-time TPD allocation deviation discussed in section III.D of CAISO's initial transmittal letter. The one-time deviation from CAISO's standard TPD allocation would have been helpful in moving forward additional generation that could have come online in the CAISO in the near-term. However, CAISO has indicated that it is no longer feasible to include that piece of the Filing while continuing to move CAISO's interconnection process forward on the timelines outlined in its tariff.<sup>7</sup> AWEA continues to

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<sup>6</sup> See AWEA Comments on Filing for more information on the reasons CAISO's filing is necessary and appropriate and should be accepted by the Commission.

<sup>7</sup> See CAISO Response to Deficiency Letter at p.8.

support CAISO's filing, even though the Filing has been amended to remove the one-time deviation to CAISO's TPD allocation.

CAISO's Response also clarifies the various pieces of the Deliverability Enhancements Filing that can be "severed" from one another, most notably clarifying that section III.B of the transmittal letter - addressing curtailment priority and self-scheduling provisions - can be severed from the other components.<sup>8</sup> AWEA would still support CAISO's filing if the Commission chooses not to accept the curtailment priority aspect of CAISO's proposal. As outlined in the initial AWEA Comment, the curtailment priority and self-scheduling provisions included in the CAISO's Filing may offer some minimal benefits, but generally are not expected to provide significant benefits to Off-Peak Deliverability Status ("OPDS") resources.<sup>9</sup> In general, AWEA expects that Load Serving Entities purchasing output from resources in CAISO will require, through contract negotiations, those resources to have OPDS. Thus, we expect most, if not all, generators in CAISO will have OPDS and will opt to fund the associated local, off-peak network upgrades. The result will be that virtually all resources in CAISO will have the ability to self-schedule, and any potential competitive "benefit" of OPDS self-scheduling will be minimized or eliminated as *all* resources will likely have the same option and "curtailment priority." Thus, if the Commission did not accept this portion of CAISO's filing, it would not impact AWEA's support for the remaining aspects of the Filing.

AWEA continues to support CAISO's Deliverability Enhancements Filing, even as amended to remove the one-time TPD allocation deviation. Moreover, AWEA's support is not contingent on the Commission's approval of the curtailment priority provisions included in Section III.B. of the initial Deliverability Enhancements Filing transmittal letter.

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<sup>8</sup> CAISO Response to Deficiency Letter at p.9.

<sup>9</sup> See AWEA Comments at p.5-6.

## II. CONCLUSION

WHEREFORE, AWEA respectfully submits these comments for the Commission's consideration, and urges the Commission to accept CAISO's amended Deliverability Enhancements Filing at the earliest possible date. AWEA submits that CAISO's amended filing is just and reasonable, and requests that, at a minimum, the Commission approve the tariff revisions discussed in Section III.A of the CAISO's transmittal letter in the initial Deliverability Enhancements Filing.

Respectfully submitted,

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