



Comments on the California ISO's Subscriber Participating Transmission Owner Model

Submitted via email to isostakeholderaffairs@caiso.com

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Pattern Energy offers these comments in support of further exploration of the Subscriber Participating Transmission Owner (PTO) model, as proposed during the stakeholder briefing on August 1, 2022.

Pattern is one of the world's largest privately-owned developers and operators of wind, solar, transmission, and energy storage projects. Our operational portfolio includes 35 renewable energy facilities that use proven, best-in-class technology with an operating capacity of 5.9 GW of installed capacity in the United States, Canada, Mexico, and Japan. Pattern Energy is headquartered in San Francisco, California and is guided by a long-term vision of transitioning the world to renewable energy.

We support the ISO's effort to expand regional transmission and enable resource diversity through development of the subscriber PTO model. We also underscore the reliability and affordability benefits that come with a technologically and geographically diverse resource portfolio. High capacity-factor regional wind is a critical component of California's 100% clean energy portfolio, as recognized in ISO's 20-year transmission outlook, and we appreciate the ISO's willingness to explore new opportunities to harness diverse renewable resources.

Pattern Energy supports the direction of this option and seeks additional details on the proposal to improve stakeholder understanding of the implications of this proposal on the following associated topics and initiatives:

- Implications for interim deliverability and Maximum Import Capability (MIC) allocations
- Implications of this proposal on the interconnection process as the ISO works through the Interconnection Process Enhancements (IPE) initiative
- Cost allocation and broader market implications

Pattern Energy is supportive of the subscriber PTO model along with the many other models for transmission development that can enable resource diversity. We recommend consideration of this model as an additional option for transmission development and look forward to working with the ISO in furtherance of our shared objectives of reliability, affordability, and decarbonization.

Sincerely,

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