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Pattern Energy appreciates the opportunity to submit comments on the CAISO's 2021-2022 draft Transmission Study Plan (plan).

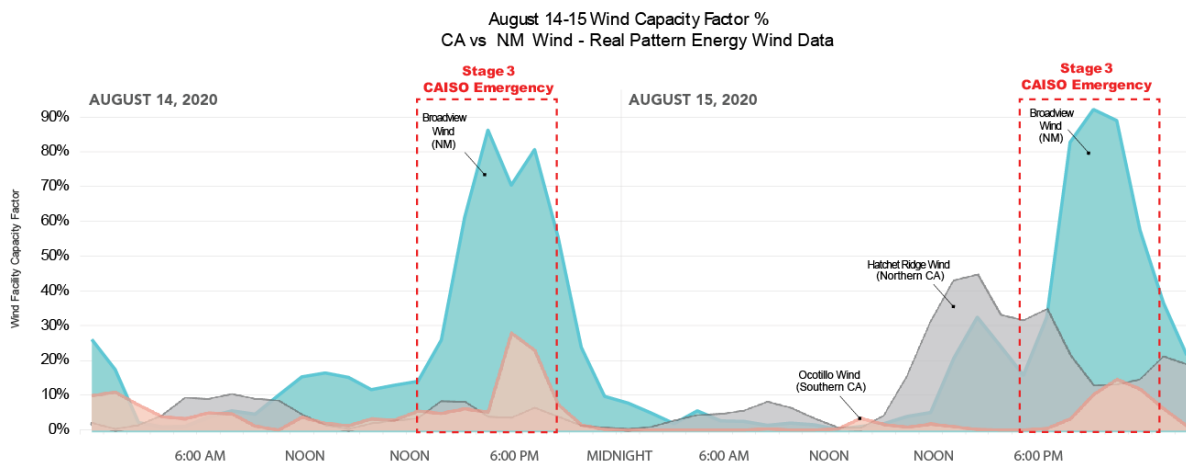
Pattern Energy commends the CPUC for identifying a high value for regional wind as a core part of CAISO's planning process, and would like to confirm our understanding that the CAISO has been directed study both Palo Verde and El Dorado interties without discrimination as a preferred injection point has not been pre-determined, as noted clearly in the following portion of the February 11, 2021 decision:

“...CPUC staff is not able to determine at which busbar location injection would best meet policy goals while minimizing costs to ratepayers. For this reason, CPUC staff appreciates CAISO reply comments, which indicated the possibility of studying the full amount at both injection points to accommodate this rare situation. Although the dashboards include only one location to prevent double counting, CPUC staff note that a single injection point has not been selected for the purposes of the TPP base case assessments.” (Page 69 of the February 11, 2021 Final Decision Attachment A.)

Pattern Energy understands that the decision to study both Palo Verde and El Dorado was confirmed in the February 25, 2021 meeting on the draft study plan. However, Pattern Energy would like to confirm this direction to study both, as there was a stakeholder comment at the meeting suggesting a pre-determined constraint through Riverside Palm Springs—if possible, please confirm in response to these written comments that both injection points will be studied equally, as Pattern understands that the RESOLVE model satisfied the transmission constraints and still sited 1,062 MWs of out-of-state (OOS) wind for delivery to the Riverside Palm Springs area.

Pattern Energy would like to again commend the CPUC and CAISO for integrating these essential and shovel ready projects into the core analysis for California to meet its greenhouse gas reduction goals quickly, reliably, and cost effectively. Pattern Energy is well equipped to comment on the value to California customers provided by regional resource diversity, as Pattern is one of the state's largest suppliers of renewable power with over two thousand megawatts of wind energy contracted to or currently serving California IOUs, CCAs, and municipal utilities and over 30 Million California customers in aggregate, via contracts that have won competitive procurements with Load Serving Entities. Pattern Energy can also comment on the viability of new transmission to cost-effectively help reduce greenhouse gas emissions,

as the company which constructed the TransBay Cable in California, Western Interconnect in New Mexico to serve 544 MW of wind energy to California, as well as the company which is currently constructing Western Spirit to serve over 1,050 MW of wind energy contracted and/or available to serve California by December 2021, and is developing more than 3,000 MW of wind which can deliver to California across the SunZia line and into the Palo Verde hub by 2025. All of the in-state and out-of-state wind developed and operated by Pattern Energy is full Product Content Category One RPS compliant power for California LSEs, and also has the benefit to customers of full 100% PTC value, even in the 2025 period being studied by CAISO. As a comment on the importance of integrating across the region to meet California GHG reduction goals reliably and cost-effectively, Pattern would like to share the graph below, which indicates the performance and output of real wind products from three of Pattern Energy’s facilities during the 2020 August black-outs, one wind facility in Northern CA, one in Southern CA, and one in New Mexico, all with full deliverability to the California system. The graph shows how complimentary load profiles from regional diversity can help with reliability.



Pattern Energy would be happy to provide comments or further technical detail for any of the transmission and generation projects mentioned above, as CAISO undergoes the Transmission Planning Process in this current cycle.

Thank you so much for the important and incredible work CAISO is doing to protect our energy future.