

## Clearway Energy Group – Initial Comments

Clearway Energy Group (“Clearway”) opposes PRR 1610, which would require VERs to self-schedule until the resource is a Stage 3 VER. Clearway concurs with the points raised in initial comments by Terra-Gen, WPTF, and LSA. Clearway is opposed to PRR 1610 as it would force a resource to self-schedule into the market until the CAISO can produce a forecast for the project. This policy will result in the bid being subject to negative market conditions and imposes undue economic risks to projects. This is a particular concern for projects contracted to meet the CPUC’s midterm reliability orders, which set June 1 as the target date each year for resources to be online – meaning that projects are often commissioned during the spring months.

Clearway encourages the CAISO to consider this change in policy in a more thorough stakeholder process where stakeholders could propose alternate paths forward to address the underlying issue.