

The Draft 2024 ISP ignores the cost of consumer energy resources, and assumes that consumer energy storage will be coordinated without cost. As a battery owner that currently participates in a VPP, that is a frankly incredible assumption. Should the grid experience more instability, I would certainly withdraw from the VPP to ensure that the battery provides the reliability I expect for my household. In those circumstances, the cost of encouraging me (and other reluctant battery owners) back to a VPP would obviously have to be recovered from other energy consumers.

If I understand it correctly, the ISP uses sequential weather years, and this does not appear to account for the possibility that a still/cloudy year may occur at an inconvenient year in the transmission build out. This may have profound implications for system reliability during the proposed transition.

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