

DOCKETED

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FTM DER in California Energy Future

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July 2026



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Current Projects & Performance

WestLight DAC-GT Portfolio:

- 3 MW solar project operating;
- 5 MW solar + storage (4-hour battery) in development

Configuration and Timeline:

3MW Solar Only, Energy Only

2022 RFO --- > 2025 COD

5MW S+S in development, Energy Only

2025 RFO ---- > December 31, 2028, COD

- Benefits: bill assistance with direct subscription to new clean energy for income-qualified households
- Cost: Lost speed to power, above market generation costs



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How WestLight Evaluates FTM DERs

- Current evaluation focuses on:
 - Regulatory requirements (IRP, Mid-Term Reliability Procurement Orders)
 - Potential Energy Value on CAISO pnode forecasts and production studies
 - RA value based on WestLight's existing Slice of Day (SOD) portfolio
- RFO Goals: Offer Price and Full Capacity Deliverability Status (FCDS)

These benefits naturally favor larger transmission-connected projects to meet RA requirements.

Issue Statement

There is a mismatch between distribution-connected resources being studied as if the resources are impacting the transmission system.



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Opportunity Statement

From a technical potential perspective, the CEC can evaluate how new distribution-connected resources can deliver the greatest overall benefit.



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How WestLight **Could** Evaluate FTM DERs with Load Modification Study

WestLight could compare Offer Price and Regulatory/Deliverability compliance costs of:

- Supply Side RA value, versus
- Demand Side RA value
- Long term:
 - RA compliance could be indifferent to supply-delivery or demand-delivery

This OIIP can Review

- Rule 21/Screen Q reform progress
- WDAT EO Resource Load Modification Capacity Value
- Benefit of new distribution-connected Generation and/or Storage in Local Capacity Area
- Distribution/Local reliability value (Dx outages >Tx outages)
- Benefit of strategically placed distribution-connected storage
 - E.g. maintain and/or create distribution headroom
- Benefit of quicker speed to power
- Option to enable immediate bill savings instead of relying 100% on downward pressure policies



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Thank you for joining us

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