



Comments of the American Wind Energy Association – California (AWEA-California) on the CAISO’s Straw Proposal in the Maximum Import Capability (MIC) Stabilization and Multi-Year Allocation Initiative

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AWEA-California Introduction

American Wind Energy Association is the national trade association for the U.S. wind industry. AWEA-California is a project of AWEA, representing companies that develop, own, and operate utility-scale wind, solar, storage, offshore wind, and transmission assets. AWEA-California works to drive immediate and sustained development of new utility-scale renewable energy to propel California toward a carbon-free electric future, and advocates for procurement processes and market structures that fully value and deploy the energy and capacity attributes of renewables to achieve an affordable, reliable, resilient, and carbon-free grid.

Comments

AWEA-California appreciates this opportunity to comment on CAISO’s Straw Proposal in the MIC Stabilization and Multi-Year Allocation stakeholder initiative. Generally, AWEA-California supports CAISO’s objectives with this initiative and believes that stabilizing the MIC and facilitating multi-year allocations will improve certainty over Resource Adequacy (RA) imports and will improve the likelihood for multi-year contracts that facilitate new, clean resource development for import to the CAISO. AWEA-California offers its support for CAISO’s proposals contained within the Straw Proposal.

The MIC stabilization proposal represents an improvement over today’s MIC calculation and will reduce unnecessary MIC fluctuations year to year. MIC fluctuations can deter contracts for import RA and should be reduced. Looking at a five-year timeframe (and selecting the highest two years) to determine MIC is highly consistent with today’s MIC calculation but will reduce MIC variation. Therefore, AWEA-California generally supports this approach.

Multi-year allocation of MIC, with significant MIC allocations being able to be “locked” in, if they are supported by underlying contracts, is an improvement over the current MIC allocation approach and will better can support new resource development for import into CAISO. In contrast, today’s annual MIC allocations can serve as a barrier to contracting for import RA. The percentages that CAISO has proposed be available for long-term MIC “lock” and a three-year



“lock” are well reasoned. Therefore, AWEA-California supports CAISO’s proposal for multi-year MIC allocation.

While AWEA-California recognizes that issues surrounding load migration must be addressed, the approach taken should be one in which underlying RA contracts are honored and MIC allocations are primarily tied to the existence of those contracts. An approach that does not honor these principles may not achieve the goal of supporting longer-term RA import contracting and potential new resource development for import into CAISO.

AWEA-California looks forward to continuing to engage with the CAISO in this initiative.