

Stakeholder Comments Template

Maximum Import Capability Stabilization and Multi-year Allocation

This template has been created for submission of stakeholder comments on the Maximum import capability stabilization and multi-year allocation revised straw proposal that was published on March 12, 2020. The paper, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at: http://www.caiso.com/StakeholderProcesses/Maximum-import-capability-stabilization-multi-year-allocation.

Upon completion of this template, please submit it to regionaltransmission@caiso.com. Submissions are requested by close of business on **April 2, 2019**.

Submitted by	Organization	Date Submitted
(submitter name and phone number) Mohan Niroula	(organization name)	(date)
Mohan.niroula@water.ca.gov 916-715-1077	California Department of Water Resources(CDWR)	3/30/2020

Please provide your organization's overall position on the Maximum Import Capability and Multi-year Allocation revised straw proposal:		
☐ Support		
Support w/ caveats		
Oppose		
Oppose w/ caveats		
No position		

Please provide your organization's comments on the following issues and questions.

1. Maximum Import Capability Stabilization

Please provide your organization's feedback on the maximum import capability stabilization topic as described in section 4.1. Please explain your rationale and include examples if applicable.

No comments.

2. Available Import Capability Multi-year Allocation Process

Please provide your organization's feedback on the available import capability multiyear allocation process topic as described in section 4.2. Please explain your rationale and include examples if applicable.

Due to the uncertainty in load share ratio and inherent certainty in the RA contract capacity for future years, CDWR prefers "Alternative 1" for multi-year allocation in which RA contracts are honored. This alternative will allocate 80% of total Maximum Import Capability (MIC) to Load Serving Entities (LSEs) three years out, and 20% of total MIC one year out. The LSEs will be able to lock 60% of their allocation for up to 20 years and an additional 20% of their allocation for up to 3 years through RA contracts.

Additional comments

Please offer any other feedback your organization would like to provide on the Maximum import capability stabilization and multi-year allocation revised straw proposal.