



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 second revised straw proposal that was published on May 21, 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 **June 11, 2020**.

Submitted by	Organization	Date Submitted
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Please provide your organization's overall position on the Maximum Import Capability and Multi-year Allocation second 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 5.1. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

NCPA agrees that extending the sample period from two years to five years, and increasing the sample size from two hours to four hours, will help stabilize MIC results which will benefit LSEs' resource planning efforts.

However, with the recent retirement of SONGS, the expected near term retirement of many of the once-through-cooling thermal plants, and eventually the Diablo Nuclear plant, will place the CAISO BAA in a situation where RA capacity will likely be in short supply. It may be assumed that CAISO based LSE RA obligations could be met with generation capacity that is surplus in neighboring BAAs, but this can only be accomplished with use of available Maximum Import Capacity. As such, it is imperative that CAISO explore opportunities to increase the amount of available MIC by considering a forward looking component that takes into account unit retirements. CAISO's stated concern that increasing MIC could reduce internal generation deliverability is valid, however, CAISO may be taking into account internal resources that will soon no longer exist and thereby allow increased import deliverability.

Please provide additional details to explain your organization's position and include supporting examples if applicable:

No additional comments at this time.

2. Available Import Capability Multi-year Allocation Process

Please provide your organization's feedback on the available import capability multi-year allocation process topic as described in section 5.2. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

NCPA believes RA contracts should only be required to specify the source BAA from which the capacity is sourced in order to qualify for multi-year MIC. More rigorous standards could artificially reduce the amount of imports that can be used as RA (even if such imports can and will actually provide power to the CAISO BAA). Alternatively, NCPA believes allowing an aggregation of specific resources to qualify for RA contracts would be absolutely necessary. For example, a RA import may be supplied from a system composed of multiple hydroelectric generators, which together will physically be available to support the RA import. In such case, due to the unique operating characteristics of individual resources within the system, the production of an individual resource may change over the course of a month (due to environmental requirements), but this would not reduce the ability of the system of resources to support the import.

NCPA strongly agrees that MIC should continue to be allocated only to the LSEs who pay for the transmission system.

Please provide additional details to explain your organization's position and include supporting examples if applicable:

No additional comments at this time.

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.

No additional comments at this time.