



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 draft final proposal that was published on July 14, 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 **August 4, 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 draft final proposal:

- Support
- Support w/ caveats
- Oppose
- Oppose w/ caveats
- No position

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

[Overall Comments:](#)

Since there is little change in the CAISO proposal from the last iteration, please refer to SCE's comments submitted previously¹ unless stated explicitly herein.

1. Maximum Import Capability Stabilization

Please provide your organization's feedback on the maximum import capability stabilization topic as described in section 6.1. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

¹ SCE Comments on CAISO Maximum Import Capability Stabilization and Multi-Year Allocation Proposal, dated June 11, 2020, available at <http://www.caiso.com/InitiativeDocuments/SCEComments-MICStabilization-Multi-YearAllocation-SecondRevisedStrawProposal.pdf>.

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

SCE continues to request the CAISO launch an effort to look into what are potential comprehensive and fundamental changes that the CAISO and stakeholder should consider in order to significantly improve the MIC allocation.

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 6.2. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

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

SCE continues to have concerns regarding the multi-year allocation proposal in general and the element of the proposal on how load migration is addressed². SCE believes that the CAISO should revisit its proposed policy in the application of load share ratios in the multi-year/long-term MIC allocation process. SCE recommends that the CAISO should consider a mechanism similar to the mechanism used in the CRR process, or other viable mechanisms, that results more equitable allocation among LSEs.

Additionally, it is unclear under the CAISO Proposal what the obligations are for resources that receive multi-year MIC allocation. Specifically, what would prevent an entity that locks up multi-year MIC rights on certain branch groups via contracts from using the allocated MIC to support non-resource specific RA resources? What would prevent the entity from receiving multi-year MIC allocation and not utilizing the MIC in a month, months, or the entire year during the RA compliance year (i.e., receiving multi-year MIC without importing any power on those branch groups)? What if the resource import used for MIC is a BAA resource but not specified in the contract? Is it sufficient then in the monthly RA showings to bring in a non-resource specific import to maintain their MIC or do they not actually need to import anything at all in order to maintain the MIC? The CAISO should clarify provisions on supply plan for the resources that are used to lock multi-year MIC and address the concern described herein.

Additional comments

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

² SCE Comments, June 11, 2020, at 3-4.