



## 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 issue paper that was published on December 2, 2019. 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](mailto:regionaltransmission@caiso.com). Submissions are requested by close of business on **December 24, 2019**.

Submitted by	Organization	Date Submitted
<i>Carrie Bentley</i> <a href="mailto:cbentley@gridwell.com">cbentley@gridwell.com</a>	<i>Gridwell Consulting for the Western Power Trading Forum</i>	<i>December 24, 2019</i>

**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 2.1. Please explain your rationale and include examples if applicable.

WPTF generally supports the CAISO's efforts to mitigate the variability in annual MIC allocations. The significant differences in allocated import capacity from year to year is problematic for forward contracting for import RA. The ability to plan based on known parameters is important for market stability and transparency. Multi-year allocations of MIC are also necessary to facilitate compliance with the CPUC's multi-year forward RA procurement compliance requirements.

WPTF requests that the CAISO provide analysis of the methodologies being considered for stabilizing the MIC allocation calculation in its next iteration.

#### 2. Available Import Capability Multi-year Assignment Process

Please provide your organization's feedback on the available import capability multi-year assignment process topic as described in section 2.2. Please explain your rationale and include examples if applicable.

Please indicate any analysis and data review that your organization believes would be helpful to review on the available import capability multi-year assignment process topic. Please provide details and explain your rationale for the type of data and analysis that you suggest.

WPTF is appreciative of the CAISO's commitment to evaluate a multi-year MIC allocation. As discussed at the September CAISO Board meeting, there are significant concerns about capacity shortfalls in the not too distant future for California. In light of this, WPTF advocated for changing the MIC process from a single year allocation to a multi-year allocation. WPTF thanks the CAISO for its responsiveness to this feedback.

#### **Additional comments**

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

In order to ensure a multi-year MIC allocation paradigm does in fact incent longer term contracting for import RA, the entire program should be evaluated holistically. WPTF strongly encourages the CAISO to analyze the multi-year allocation along side other design elements such as an auction process. While this does expand the initial scope of the initiative, now is the opportunity to develop an efficient and transparent tool to allocate RA import capacity to help mitigate the potential capacity shortfall.