

## Southwestern Power Group Comments on Market Design Initiatives Catalog

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Southwestern Power Group (SWPG) appreciates the opportunity to submit comments to regarding the CAISO's Market Design Catalog Initiative stakeholder process. The Southwestern Power Group is an Independent developer of utility-scale generation and transmission in the Desert Southwest.

SWPG is developing a Double-circuit 500 kV interstate transmission project between central New Mexico and Metro-Phoenix. The purpose of the project is to deliver primarily renewable energy from NM and AZ to western markets (at the Palo Verde hub).

### **Recommendation to Explicitly Include Multi-Year RA Import Allocation Process in Catalog**

In 2011 SWPG encouraged the ISO to include an effort to develop a Multi-Year RA import allocation process as part of the stakeholder initiatives. The ISO included such an item in its 2012 catalog. The item was ranked high by several Stakeholders. The ISO ultimately included this element, but coupled it under its Multi-year Forward Reliability Capacity Pricing Mechanism (item 8.3) starting with its November 20 2012 draft catalog.

In 2013 the ISO has refocused its long term procurement initiative on the joint reliability framework. SWPG again submitted comments, and as a result the CAISO explicitly mentioned the multi-year RA import allocation in its joint reliability framework initiative.

This year, while the CAISO has continued to include the Joint Reliability Plan as an initiative in its stakeholder catalog (Item 8.3), there is no mention of the multi-year RA import allocation activity. We expect this is simply an oversight on the CAISO's part rather than that the CAISO intends to disregard this policy item. SWPG requests that the CAISO again add the multi-year RA import allocation as an explicit item under the new initiative 10.7 Maximum Import Capability. It would otherwise seem inappropriate to simply drop this important policy initiative, especially in light of the fact of the fact that it has been ranked high by participants in past years and given that the CAISO has in mind reconsideration of other design features of RA import capacity allocation.

Thank you for your consideration.