## Comments to the CAISO's Straw Proposal for Deliverability of Resource Adequacy on Interties

ZGlobal offers the following comments to the CAISO's April 6, 2011 Straw Proposal for Deliverability of Resource Adequacy Capacity on Interties.

The CAISO's straw proposal is well thought out and appears to achieve the primary objectives of the initiative. ZGlobal has two comments/questions.

After establishing target expanded MIC MW values for each intertie and then
determining whether sufficient RIC is available after Step 4 of the RA import
allocation process to meet the target MIC values, the CAISO proposes to perform
its TPP studies to identify any network upgrades needed on the CAISO system to
support the target MIC values.

This is a bit confusing because it is assumed that as long as the target MIC MW value on a particular intertie is less than or equal to the rating of the intertie, then the MW value should be deliverable, otherwise the intertie rating is not respected as a limit. If TPP studies determine that certain generators downstream of the intertie are deliverable by assuming something less than the intertie rating, then there is an inconsistency.

Is it correct to assume that a MIC MW value that is less than the rating of the intertie can be counted MW-for-MW or could it conceivably be limited to something less than the intertie rating due to the impact of generation from downstream generators? If it is the latter, then is the intertie rating compromised based on the output of the generators?

 The CAISO Maximum RA Import Capability for Year 2011 after Step 4 lists IID-SDGE with a net import of negative 159 MW, a corresponding Maximum Import Capability of 0 MW and an OTC of 239 MW.

Is the maximum amount of RA available (ignoring the prospect of a need for network upgrades for now) on that intertie equal to the OTC of 239 MW or will the CAISO take advantage of counter-scheduling and be able to count 398 MW (239 MW + 159 MW)?