

Middle River Power Comments on Local Capacity Technical Study Criteria Update

Middle River Power (“MRP”) thanks the California ISO (“CAISO”) for the opportunity to submit these brief comments on the Local Capacity Technical Study Criteria Update presentation and call held on May 30, 2019. We provide the following brief comments on the proposed change to the LCT planning standards.

MRP is supportive of the CAISO aligning the mandatory standards used in the LCT study with those used in other planning studies. The current misalignment between standards across CAISO studies creates inefficiencies from a planning perspective within the CAISO and across agencies. By using the same standards in all studies, the CAISO, CPUC, and stakeholders will be able to have a clear understanding of the trade-offs between transmission, retirements, and replacement capacity. This is especially true with it comes to assessing retirements and replacement capacity within a local area. It is MRP’s understanding that theoretically (and perhaps historically) merely ensuring the LCT requirement was met would not necessarily be sufficient to enable a resource that is providing “excess” LCT capacity to retire. This is because the resource’s retirement would be studied under higher criteria than the LCT study. Thus, using the same mandatory standards in the LCT studies as is used in the retirement studies would allow for a more apples to apples comparison between retirement and replacement capacity within local area. Ultimately, MRP believes aligning study assumptions improve transparency and lead to more efficient retirements.

MRP thanks the CAISO for the opportunity to comment on the LCT Criteria Update.