



## 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 second revised straw proposal that was published on May 21, 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](mailto:regionaltransmission@caiso.com). Submissions are requested by close of business on **June 11, 2020**.

| Submitted by   | Organization                                 | Date Submitted |
|--|--|----------------|
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*The Sacramento Municipal Utility District (SMUD) provides the following comments on the CAISO's Maximum Import Capability (MIC) Stabilization and Multi-Year Allocation Second Revised Straw Proposal, dated May 21, 2020 (Straw Proposal). SMUD currently participates in the Energy Imbalance Market (EIM) and is an active participant in the CAISO's day-ahead and real-time markets. In addition to system reliability issues caused by changes to the Resource Adequacy (RA) structure, SMUD has an interest in this initiative as we look for potential opportunities to participate as an import intertie supplier in the CAISO RA market in the future.*

*SMUD appreciates the CAISO's efforts to improve the MIC process, and the current proposal is an improvement over the existing structure. Throughout this initiative, SMUD has conditionally supported the CAISO's proposals as SMUD attempted to work within the framework proposed. SMUD has advocated for greater access to import RA and the removal of unreasonable barriers to stimulate use of, and investment in, import RA resources, but at the same time recognizing that reliability of the CAISO grid is a critical piece of the RA market. Other stakeholders in this initiative have commented that the CAISO should abandon MIC altogether or base the MIC on total intertie capacity; SMUD sees a number of benefits with these concepts, namely it increases RA availability, especially at a time when California and the West overall faces a capacity shortfall. Abandoning MIC altogether or basing the MIC on total intertie capacity moves away from the an overly restrictive MIC limitation that does not reflect today's current situation.*

*SMUD encourages the CAISO to consider these other proposals, specifically that proposed by the California Municipal Utilities Association (CMUA).*

**Please provide your organization's overall position on the Maximum Import Capability and Multi-year Allocation second revised straw proposal:**

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

**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 5.1. (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:

### **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 5.2. (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:

**Additional comments**

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

*The Straw Proposal on page 21 summarizes stakeholder positions on allocating multi-year MIC. SMUD notes that the CAISO has added in parenthesis that we are “(representing a few CCAs),” which is not accurate. While SMUD is a contractor to community choice aggregators, SMUD is participating in this initiative for its own interests as mentioned above, not those of community choice aggregators. We ask the CAISO remove this statement to clarify the record.*