

Stakeholder Comments Template

**Deliverability of Resource Adequacy  
Capacity on Interties**

Submitted by	Company	Date Submitted
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This template is for submission of stakeholder comments on the topics listed below, covered in the *Deliverability of Resource Adequacy Capacity on Interties Straw Proposal* posted on April 6, 2011, and issues discussed during the stakeholder conference call on April 13, 2011, including the slide presentation.

Please submit your comments below where indicated. Your comments on any aspect of this initiative are welcome. If you provide a preferred approach for a particular topic, your comments will be most useful if you provide the reasons and business case.

Please submit comments (in MS Word) to [RAimport@caiso.com](mailto:RAimport@caiso.com) no later than the close of business on April 20, 2011.

Noble Americas Energy Solutions LLC (“Noble Solutions”) supports the CAISO’s recommendation to expand the MIC MW methodology.

However, Noble Solutions requests that the CAISO also review the Pre-Import RA commitment process as part of the stakeholder process in expanding the Remaining Import Capacity (“RIC”). The CAISO states, in the straw proposal, that its “base case policy includes renewable resources that will be sufficient to meet the state mandate of 33% renewable energy on an annual basis by 2020.” The CAISO stated, on the April 13<sup>th</sup>, 2011 Stakeholder Conference Call, that “several entities” had agreed upon a Pre-Import RA commitment process. We believe that the lack of an open and transparent stakeholder process on this particular sub-issue does not give all interested parties an opportunity to have their input and concerns addressed by the CAISO. Specifically, Noble Solutions requests that the CAISO review the pre-import RA commitment contracts and develop a process that incorporates a step that rejects, going forward, all current pre-import contracts signed before 2005 that do not meet its current policy objectives. This additional step will expand the RIC and allow for all load serving entities the opportunity to receive a more equitable share of the RA import allocation on the interties.

