

Comments on Maximum Import Capability Enhancements Issue Paper

Department of Market Monitoring

April 1, 2021

I. Summary

The ISO Department of Market Monitoring (DMM) appreciates the opportunity to comment on the Maximum Import Capability (MIC) Enhancements Issue Paper.¹ DMM submits the comments below in support of the ISO's proposal to develop a process for reservation of import capability and transmission for wheel-through transactions.

II. Comments

Reservation of import capability and transmission for wheel-through transactions

The ISO states in the issue paper that it plans to explore development of a process for requesting and reserving import capability and transmission to support wheel-through transactions on the CAISO system. DMM supports the ISO's commitment to developing this process in the MIC Enhancements initiative.

In the final proposal of the Market Enhancements for Summer 2021 Readiness initiative, the ISO has proposed temporary market design rules to establish priorities for wheel-through transaction for summer 2021.² DMM supports those temporary measures as improvements that better align the practices of the CAISO with those of other BAAs. However, DMM recommends the ISO continue to work on making its operating practices for wheel-through transactions even more equivalent to those of other BAAs.

Based on DMM's understanding rules and practices in other BAAs, this would involve the following additional changes:

- Establishing a process to determine excess available transmission capacity on the CAISO system;
- Establishing an option for wheel-through transactions to purchase excess firm or similar quality transmission on a long-term basis, and;
- Developing clear and consistent priority access to transmission for CAISO load, and other network-quality transmission customers, relative to hourly wheel-through schedules.

DMM supports the ISO's inclusion of wheel-through transmission provision topics in in the issue paper, and DMM appreciates the immediacy with which the ISO has begun to seek durable, long-term solutions to the provision of transmission access to wheel-through transactions.

¹ *Maximum Import Capability Enhancements – Issue Paper*, California ISO, March 11, 2021:

<http://www.caiso.com/InitiativeDocuments/IssuePaper-MaximumImportCapabilityEnhancements.pdf>

² *Market Enhancements for Summer 2021 Readiness – Final Proposal*, California ISO, March 19, 2021:

<http://www.caiso.com/InitiativeDocuments/FinalProposal-MarketEnhancements-Summer2021Readiness.pdf>