

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**California Independent System)
Operator Corporation)**

Docket No. ER22-844-000

**MOTION TO INTERVENE AND COMMENTS
OF THE DEPARTMENT OF MARKET MONITORING
OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§385.212, 385.214, the Department of Market Monitoring (“DMM”), acting in its capacity as the Independent Market Monitor for the California Independent System Operator Corporation (“CAISO”), submits this motion to intervene and comment in the above-captioned proceeding.

I. MOTION TO INTERVENE

DMM respectfully requests that the Commission afford due consideration to these comments and motion to intervene, and afford DMM full rights as a party to this proceeding. Pursuant to the Commission’s Order 719, the CAISO tariff states “DMM shall review existing and proposed market rules, tariff provisions, and market design elements and recommend proposed rule and tariff changes to the CAISO, the CAISO Governing Board, FERC staff, the California Public Utilities Commission, Market Participants, and other interested entities.”¹ As this proceeding involves CAISO tariff provisions that would affect the efficiency of CAISO markets, it implicates matters within DMM’s purview.

¹ CAISO Tariff Appendix P, Section 5.1.

II. SUMMARY

In this filing, the CAISO proposes changes to its processes for determining and allocating maximum import capability (MIC).² Specifically, these proposed tariff changes include:

- Allowing load serving entities (LSEs) and other entities to request MIC expansions at branch groups under certain conditions; and
- In Step 13, if any unassigned import capability remains available for allocation, giving priority to load serving entities with existing resource adequacy contracts over other requests received on the same day.

DMM supports CAISO's proposed changes as incremental improvements to the current maximum import capability framework.

III. COMMENTS

Allow entities to request expansions

CAISO proposes to allow load serving entities and other participants to request maximum import capability expansions at branch groups under certain conditions. DMM supports CAISO developing a new process for entities to request expansions since this additional import capability could help ensure that resources already under contract or new projects committed to serve CAISO load can count for resource adequacy.

Enhancements to step 13 of the allocation process

DMM also supports the proposal to give some additional priority to load serving entities with existing resource adequacy contracts in the final step of the MIC allocation

² *California Independent System Operator Corporation Maximum Import Capability Allocation Process Enhancements*, California Independent System Operator Corporation, Docket No. ER22-844-000, ("Transmittal Letter").

process. In Step 13, if any unassigned import capability remains available for allocation, CAISO will give priority to load serving entities with existing resource adequacy contracts over other requests received on the same day. This change will incrementally improve the likelihood that maximum import capability will be allocated to entities that already have resource adequacy contracts signed; mitigating to some extent the chance that resource adequacy already under contract could be stranded because the load serving entity was not able to obtain maximum import capability.

IV. CONCLUSION

DMM respectfully requests that the Commission afford due consideration to these comments as it evaluates the proposed tariff provisions before it.

Respectfully submitted,

By: /s/ Ryan Kurlinski

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Independent Market Monitor for the
California Independent System Operator

Dated: February 9, 2022

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 9th day of February, 2022.

Jennifer Shirk
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