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Comments of the Imperial Irrigation District on the Stakeholder Initiatives Catalog

The Imperial Irrigation District (“IID”) appreciates the opportunity to comment on the 2015 Stakeholder Initiatives Catalog (“Catalog”).

IID’s Comments are limited to the issue of Maximum Import Capability (“MIC”) set forth at Section 10.7 of the Catalog. In particular, IID supports the reexamination of the MIC methodology as set forth in Section 10.7.1.

IID supports this initiative for several reasons. First, Resource Adequacy (“RA”) counting for all resources is a critical component to commercial success and, as such, it is important to be assured that the measure for RA counting is based upon a sound technical and forward looking mechanism, rather than the historical scheduling approach as a baseline that was developed years ago. Second, the RA paradigm is undergoing substantial change. In particular, multi-year RA requirements will necessitate a shift in how MIC is considered and allocated.

Finally, as MIC works with the CAISO Balancing Authority Area deliverability assessment currently, imports have no durable mechanism that will preserve RA counting. Given that bilateral and procurement processes can span multiple Transmission Planning Process (“TPP”) cycles, imports competing for power purchase agreements are facing uncertainty and consequent discrimination due to the practical application of the current methodology.

All of these issues support a comprehensive reconsideration of the consideration of the MIC methodology.

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