

Stakeholder Comments Template

Subject: Regional Resource Adequacy Initiative

Submitted by	Company	Date Submitted
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Marin Clean Energy (MCE) requests that the CAISO revise its proposal on adjustments to intra-year load forecasts. The CAISO states that it is “appropriate to allow LSEs to update load forecasts intra-year only for load migration due to retail choice.”¹ MCE strongly concurs. However, the CAISO then appears to restrict such intra-year adjustments to load migration solely attributable to direct access. MCE requests that the CAISO revise its proposal to specify that intra-year adjustments to load forecasts would be permitted for *all* load migration associated retail choice, including load migration attributable to community choice aggregation (CCA). The CPUC rules currently permit such intra-year adjustments for all load migration, both direct access and CCA, and the CAISO rules should be consistent.

Marin Clean Energy takes no position on the remainder of CAISO’s proposal at this time.

¹ 3rd Revised Straw Proposal, p. 11.