



Stakeholder Comments Template

Maximum Import Capability Stabilization and Multi-year Allocation

This template has been created for submission of stakeholder comments on the Maximum import capability stabilization and multi-year allocation second revised straw proposal that was published on May 21, 2020. The paper, stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/StakeholderProcesses/Maximum-import-capability-stabilization-multi-year-allocation>.

Upon completion of this template, please submit it to regionaltransmission@caiso.com. Submissions are requested by close of business on **June 11, 2020**.

Submitted by	Organization	Date Submitted
Mohan Niroula Mohan.niroula@water.ca.gov 9165740712	California Department of Water Resources	06/10/2020

Please provide your organization's overall position on the Maximum Import Capability and Multi-year Allocation second revised straw proposal:

- Support
 Support w/ caveats
 Oppose
 Oppose w/ caveats
 No position

Please provide your organization's comments on the following issues and questions.

1. Maximum Import Capability Stabilization

Please provide your organization's feedback on the maximum import capability stabilization topic as described in section 5.1. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

[Support with caveats.](#)

[CAISO proposal indicates that current allocation process step 1 through step 4 for upcoming year does not change. Step 4 assigns allocation of import capacity associated with the pre-RA commitments. CDWR supports this aspect and would like](#)

to recommend no resource specific requirement for the existing pre-RA commitments, and that the proposal doesn't impact the existing pre-RA commitments for the remaining contract period.

Please provide additional details to explain your organization's position and include supporting examples if applicable:

2. Available Import Capability Multi-year Allocation Process

Please provide your organization's feedback on the available import capability multi-year allocation process topic as described in section 5.2. (Please indicate Support, Support with caveats, Oppose, or Oppose with caveats)

Support with caveats.

The proposal adopts simplified "Alternative 2" in which allocation will follow the existing allocation process step 1 through step 4 in which there will be no change in the calculations for pre-RA import commitments. CDWR supports this aspect and would like to recommend no resource specific requirement for the existing pre-RA commitments, and that the proposal doesn't impact the existing pre-RA commitments for the remaining contract period.

Please provide additional details to explain your organization's position and include supporting examples if applicable:

Additional comments

Please offer any other feedback your organization would like to provide on the Maximum import capability stabilization and multi-year allocation revised straw proposal.

On slide 25, CAISO indicates that an extension of an old contract (Pre-RA Import Commitment or New Use) is treated as a new contract and must meet the proposed new Tariff and BPM requirements to achieve a new lock based on its own merits. Please confirm that the new tariff and BPM requirement will not be applicable to the existing Pre-RA Import Commitments for the existing term of the contract.

Requiring existing pre-RA commitments to meet the proposed Tariff and BMP requirements, would cause unnecessary burden and onerous tasks to amend contracts to make them eligible for import allocations.