

The CAISO received comments on the topics discussed at the August 11, 2021 stakeholder meeting from the following:

1. [ACP California](#)
2. [California Community Choice Association \(CalCCA\)](#)
3. [California Department of Water Resources \(CDWR\)](#)
4. [California ISO Department of Market Monitoring \(DMM\)](#)
5. [Northern California Power Association \(NCPA\)](#)
6. [Pacific Gas & Electric \(PG&E\)](#)
7. [Salt River Project \(SRP\)](#)
8. [Shell Energy](#)
9. [Southern California Edison \(SCE\)](#)
10. [Six Cities](#)
11. [Southwestern Power Group \(SWPG\), Pattern Energy \(“Pattern”\) and Valley Electric Association, Inc. \(“VEA”\)](#)
12. [Silicon Valley Power \(SVP\)](#)

Copies of the comments submitted are located on the Maximum Import Capability Enhancements webpage at:

<https://stakeholdercenter.caiso.com/StakeholderInitiatives/Maximum-import-capability-enhancements>

The following are the CAISO's responses to the comments.

1. ACP-California Submitted by: Caitlin Liotiris		
No	Comment Submitted	CAISO Response
1a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b></p> <p>ACP-California appreciates CAISO’s ongoing efforts to improve the MIC process. Given California’s new and growing need for a diverse set of clean resources, MIC is becoming increasingly important. We applaud CAISO’s efforts in the Revised Straw Proposal to look at new methods for expanding MIC through the newly proposed “MIC expansion request” process.</p> <p>In these comments, we suggest that the methods for expanding MIC be broadened to include another, separate option to expand MIC through an “expression of interest” (and subsequent subscription) process. Under an “expression of interest” process, interested parties (LSEs, generators and potentially others) could indicate to CAISO an interest in expanded MIC at individual branch groups, without having to meet pre-defined requirements (such as having an existing RA contract). If sufficient interest is identified through the expression of interest, CAISO could study MIC expansion options and either approve those expansions as economic/in the interest of ratepayers or offer interested parties an opportunity to pay for a subscription to the expanded MIC at the applicable branch group.</p> <p>Additionally, we encourage CAISO to allow not only LSEs, but also developers, to acquire MIC through the expression of interest and subscription process proposed in these comments. This would provide an avenue through which resources that can deliver to CAISO branch groups could obtain (and retain) MIC and may improve and streamline contracting with CAISO LSEs for imported RA resources. We appreciate CAISO’s efforts to continue to explore improvements to the MIC process and look forward to continuing to participate in this initiative.</p>	<p>Thank you for your comments.</p> <p>Thank you for your suggestion.</p> <p>Based on stakeholder input during the last two years on MIC improvements it was reemphasized that MIC on ratepayer payed transmission will be allocated to LSEs that pay for that transmission. The CAISO will not open this item up for discussion at this junction in the current stakeholder process.</p>
1b	<p><b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b></p> <p>Improved transparency will be important for imported RA resources and LSEs going forward. Making data on owners of MIC allocations at the branch group level publicly available will be beneficial to various market participants.</p> <p>CAISO should ensure that, whatever this data is available to be publicly posted, it is broadly available and easy to access. Providing access to</p>	<p>Data will be publically available.</p>

No	Comment Submitted	CAISO Response
	<p>information through CAISO applications (such as CIRA) may inhibit access by some parties and/or add difficulty and time to the process of acquiring information on MIC. All data that can be publicly posted should be easily accessible (e.g., on the CAISO website) and should not require interested parties to utilize CAISO applications.</p> <p>Additionally, ACP-California supports the suggestion of Joint Parties for CAISO to augment the information it posts on MIC to include a summary of the branch groups that were over requested in steps 4a, 4b, 9, 11, and 13. The information provided by CAISO should also include information on how many MWs in particular branch groups were over requested by to improve overall MIC transparency.</p>	<p>The CAISO has included a detailed response to Joint Parties comments at item 11b below.</p>
1c	<p><b>3. Provide your organization's comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b></p>	
1d	<p><b>4. Provide your organization's comments on the MIC Capability expansion topic, as described in section 4.3:</b></p> <p>ACP-CA appreciates that CAISO has included this topic in the Revised Straw Proposal. Considering new and improved methods for expanding MIC is an important undertaking which can support LSEs ability to meet RA obligations with a broader set of diverse, clean imported resources which may be delivered on new transmission. ACP-California, therefore, supports the proposed "expansion request" process CAISO has outlined to provide a new avenue to expand MIC, whereby entities meeting certain criteria can request MIC expansions.</p> <p>In addition to the more formal MIC expansion request process CAISO has proposed in the Revised Straw Proposal, which includes certain criteria of "legitimate need" in order to limit queued requests to increase MIC, ACP-California suggests that CAISO should also develop a process by which an indication of interest for expanded MIC can be considered without a stringent demonstration of "legitimate need." Thus, we suggest the addition of another, separate process by which MIC may be able to be expanded. This additional process will be referred to as the "expression of interest" and subscription process.</p>	<p>Thank you for your support.</p> <p>Because deliverability for imports (MIC) interacts with deliverability for internal generation the CAISO believes that any entity submitting requests to increase import deliverability is financially committed to the increase in a similar way that entities proposing new generation interconnection requests are. As such, at this time, the CAISO will not amend the current proposal. The CAISO is willing to reconsider this concept through a future stakeholder process where private pay for MIC expansion requests will get addressed.</p>

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	<p>At a high-level, an “expression of interest” process would allow interested parties (including LSEs and developers) to indicate their interest in expanded MIC at a particular branch group. This would provide CAISO an indication of the commercial interest in expanding MIC at particular locations. CAISO would utilize these expressions of interest to determine the locations where there is the most interest in MIC expansion. CAISO could then study upgrade opportunities to expand MIC at the locations where there is the most interest. Similar to CAISO’s MIC expansion request proposal, if the identified upgrades from the “expression of interest and subscription” process are shown to be economic or in the best interest of ISO ratepayers, then the MIC expansion could be paid for by ISO ratepayers and allocated to LSEs using the applicable allocation methodology. But, if the expansion is not found to be economic or in the best interest of ratepayers, interested parties could be given an opportunity to subscribe to increased MIC at the location, via paying for their share of the associated upgrade costs. This type of a process could facilitate expansions to MIC based on commercial interest and, in doing so, and could help improve CAISO’s access to a diverse set of clean resources. The opportunity to indicate an interest in expanding MIC, and to subscribe to MIC, should be afforded not only to LSEs, but also to developers of generation/transmission which may seek to provide imported RA resources to CAISO LSEs.</p> <p>ACP-California suggests that CAISO augment its proposal related to increasing MIC to also include a process to indicate commercial interest in expanding MIC and to develop a subscription model where expanded MIC could be allocated or purchased at locations with the highest level of interest. Importantly, for the MIC expansion request process proposed by CAISO and for the “expression of interest and subscription” process proposed in these comments, we urge CAISO to include options for generation/transmission developers to, themselves, acquire and retain expanded MIC. Such a process would help streamline and provide certainty to contracting for imported RA resources.</p>	
1e	<p><b>5. Provide your organization’s comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b></p> <p>ACP-California does not oppose giving LSEs with RA contracts priority during the step 13 of the allocation process and agrees with Six Cities that it would be</p>	<p>The draft final proposal will assign step 13 available MWs in proportion to the size of each requestor’s RA contract rather than on first come-first serve basis if there is more than one request at a given intertie.</p>

No	Comment Submitted	CAISO Response
	reasonable to assign MW in proportion to the size of each requestor's RA contract rather than on first come-first serve basis.	
1f	<b>6. Provide your organization's comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b>	
1g	<b>7. Provide your organization's comments on other issues that require further exploration, as described in section 4.6:</b>	
1h	<b>8. Provide your organization's comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b>	
1i	<b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b>	





No	Comment Submitted	CAISO Response
	<p>locked in by LSEs on specific branch groups. CalCCA does not take issue with the opportunity for LSEs to lock in longer-term MIC for multiple years as adopted in the MIC Stabilization and Multi-Year Allocation initiative but requests the CAISO monitor and report out on how much MIC is being locked in for multiple years to ensure adequate short-term MIC is also available. If in the future significant portions of MIC are locked in many years forward (including evergreen contracts), it could create challenges for LSEs year-long import contracts looking to secure MIC. The CAISO should monitor and report out on the amount multi-year MIC so stakeholders are aware of the amount of MIC that is locked in for future years.</p>	<p>the total locked-up amounts and still available Remaining Import Capability see last few rows in this document:  <a href="http://www.aiso.com/Documents/Step6-2022AssignedandUnassignedRAImportCapabilityonBranchGroups.pdf">http://www.aiso.com/Documents/Step6-2022AssignedandUnassignedRAImportCapabilityonBranchGroups.pdf</a> .</p>
2c	<p><b>3. Provide your organization's comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b>            No comments at this time.</p>	
2d	<p><b>4. Provide your organization's comments on the MIC Capability expansion topic, as described in section 4.3:</b>            No comments at this time.</p>	
2e	<p><b>5. Provide your organization's comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b>            No comments at this time.</p>	
2f	<p><b>6. Provide your organization's comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b>            No comments at this time.</p>	
2g	<p><b>7. Provide your organization's comments on other issues that require further exploration, as described in section 4.6:</b>            In the Revised Straw Proposal, the CAISO lists several issues that the CAISO does not plan to move forward with or that require further exploration before moving forward with a proposal. These issues include developing an auction mechanism for allocating MIC, conducting deliverability studies after RA showings, releasing unused MIC, and changing the methodology for calculating MIC to include liquidity. CalCCA generally supports the CAISO's decision not to</p>	<p>Thank you for your support.</p>

No	Comment Submitted	CAISO Response
	<p>move forward with these changes at this time, given the current allocation process generally works well by allocating MIC to LSEs responsible for paying the costs of the transmission system and meeting RA obligations. A method that continues to allocate MIC to LSEs based on its load ratio share, coupled with improvements to transparency proposed in this initiative and the removal of substitution requirements and RAAIM contemplated in the RA Enhancements initiative, should result in efficient allocation and use of MIC.</p>	
2h	<p><b>8. Provide your organization’s comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b>            CalCCA continues to support the Energy Imbalance Market (EIM) Governing Body classification for this initiative.</p>	<p>Thank you for your support.</p>
2i	<p><b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b>            No additional comments at this time.</p>	





3. California Department of Water Resources (CDWR) Submitted by: Mohan Niroula		
No	Comment Submitted	CAISO Response
3a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b></p> <p>CDWR continues to support CAISO efforts on potential improvements (in the areas of MIC calculation, allocation, and usage provisions) that maintain the fundamental principle of the MIC framework that existing ownership rights, existing transmission contracts, and pre-existing RA commitments should be recognized and respected. CDWR acknowledges that CAISO does not plan to move forward with three scope items: 1) conducting deliverability studies at the end of RA showings process, 2) incorporation of auction or market-based assignment process, and 3) recapture and release of unused MIC allocations.</p>	Thank you for your support.
3b	<p><b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b></p> <p>CAISO considers making MIC data publicly available (potentially in CIRA) identifying owners of all MIC allocations at the branch group level including MW, contact person, MWs available for trade etc. The exact information that will be posted in CIRA should be identified in this proposal.</p> <p>If CAISO updates the unused MIC daily, it will provide further clarity and opportunity for a bilateral transaction for recapture of unused MIC until the plans are locked at T-30. CAISO should also consider if unused MIC (after T-30) can be utilized for forced outage or planned outage substitution by an import resource after the RA showing, by the original owner of the MIC allocation, and by another entity who wants to trade the unused MIC for substitution using an import resource.</p>	<p>The draft final proposal will have further details into this matter.</p> <p>Outage substitution rules are not part of this stakeholder process. Your suggestion may be further explored when outage substitution rules are discussed through a different initiative.</p>
3c	<p><b>3. Provide your organization’s comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b></p> <p>No comment.</p>	
3d	<p><b>4. Provide your organization’s comments on the MIC Capability expansion topic, as described in section 4.3:</b></p> <p>CDWR is supportive of CAISO’s proposal that stakeholders with the following legitimate reasons be allowed to make requests for MIC expansions under a</p>	Thank you for your support.

No	Comment Submitted	CAISO Response
	<p>new process: 1) Existing RA import contract (internal LSEs) not already used as Pre-RA Import Commitment or New Use Import Commitment. 2) Owners of new transmission connecting to the CAISO grid from an external Balancing Authority Area (BAA) if not already covered under the policy-driven MIC expansion option.</p>	
3e	<p><b>5. Provide your organization's comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b>            The CAISO in the proposal specifies that if two or more LSEs have RA contracts that exceed the amount left after step 12 on any given branch groups, then the assignment will go to the request received first (earliest) and so on until all MWs have been assigned. CDWR prefers that the allocation be prorated than the first come first serve basis; there should be a fixed deadline when requests are submitted and after the deadline, total available import capability should be prorated to the aggregated request for allocation after step 12 so all the entities in need of MIC can benefit from such allocation.</p>	<p>See response to 1e above.</p>
3f	<p><b>6. Provide your organization's comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b>            CDWR supports the CAISO intent to update Tariff and Reliability Requirements BPM language to be consistent with current approved practice of using two decimal places in transactions, and showings; the proposal specifies the need to make a change in the section 40.4.6.2.2.2 to two decimal numbers.</p>	<p>Thank you for your support.</p>
3g	<p><b>7. Provide your organization's comments on other issues that require further exploration, as described in section 4.6:</b>            MIC calculation based on shown RA may not be appropriate because some contracts that are dependent on hydrology (such as hydro resource) may have inherent uncertainty associated with the availability of resource and if an LSE's load is hydrology dependent, there could be wild swings in LSE's RA showing quantity utilizing the MIC.</p>	<p>The CAISO will not move forward, at this time, with a methodology based on RA showings.</p>
3h	<p><b>8. Provide your organization's comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b>            No comment.</p>	



No	Comment Submitted	CAISO Response
3i	<p><b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b></p> <p>CDWR agrees that deliverability study at the end of RA showings could leave LSEs with stranded assets and has a possibly significant ramification on Capacity Procurement Mechanism (CPM) backstop costs allocations.</p>	<p>Thank you for your support on eliminating this item from further consideration.</p>



4. California ISO Department of Market Monitoring (DMM) Submitted by: Christy Sanada		
No	Comment Submitted	CAISO Response
4a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b></p> <p><b>I. Summary</b>            The ISO Department of Market Monitoring (DMM) appreciates the opportunity to comment on the Maximum Import Capability (MIC) Enhancements Revised Straw Proposal.<sup>1</sup></p> <p><b>II. Comments</b>  <b>Given that MIC is necessary to support resource adequacy from external sources, it is important to ensure that MIC can be expanded to support future resource adequacy needs and that available MIC can be allocated among entities in a way that does not unnecessarily restrict load serving entities’ ability to contract for external capacity.</b></p> <p>Under the ISO’s resource adequacy framework, MIC is required for a load serving entity (LSE) to count external capacity as resource adequacy. MIC is required for all external capacity including pseudo-tie and dynamically scheduled resources. In recent years, system capacity has become scarce in summer months and some LSEs have found it increasingly difficult and expensive to contract for additional system capacity. The ISO has also issued several Significant Event CPMs at the CPM soft offer cap to resources in July and August, and continues to seek additional capacity for September and October on a rolling basis, indicating the ISO’s ongoing demand for additional system capacity.<sup>2</sup></p> <p>To the extent that an unavailability of MIC could be preventing LSEs from contracting for additional import capacity to meet system capacity needs, then there is value to enhancing MIC processes to free up unused MIC. To better facilitate contracting for capacity that the CAISO, CPUC and other LRAs are</p>	<p>Thank you for your comments.</p>

<sup>1</sup> Maximum Import Capability Enhancements – Revised Straw Proposal, California ISO, August 4, 2021:

<http://www.aiso.com/InitiativeDocuments/RevisedStrawProposal-MaximumImportCapabilityEnhancements.pdf>

<sup>2</sup> <http://www.aiso.com/Documents/JulyandAugust2021SignificantEventandExceptionalDispatchCPMReport.pdf>

[http://www.aiso.com/Documents/CPMSignificantEvent-Intent-Solicit-DesignateCapacity-ContinuedEffort\\_Reminder.html](http://www.aiso.com/Documents/CPMSignificantEvent-Intent-Solicit-DesignateCapacity-ContinuedEffort_Reminder.html)

[http://www.aiso.com/Documents/CPMSignificantEvent-Intent-Solicit-DesignateCapacity-ContinuedEffort\\_Reminder-082321.html](http://www.aiso.com/Documents/CPMSignificantEvent-Intent-Solicit-DesignateCapacity-ContinuedEffort_Reminder-082321.html)

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	<p>looking for, the ISO should continue to enhance MIC processes to better ensure that entities that need MIC to support resource adequacy contracts can obtain MIC to the extent it is available.</p> <p>As noted in prior comments, DMM has observed that during August and September 2019 and 2020 there were with non-zero bilateral prices for MIC at certain branch groups on which there appeared to be MIC that was not used by LSEs to support resource adequacy contracts on those branch groups based on monthly supply plan showings.<sup>3</sup></p> <p>As shown in Figure 1, DMM ran these same metrics for August and September 2021. Results for September 2021 show that at NOB and Malin MIC traded at prices up to \$10/kW-month, while there appeared to be unused MIC remaining at these branch groups.<sup>4</sup> While DMM cannot determine whether this excess MIC was in fact offered for sale bilaterally (and perhaps did not transact), these findings indicate that there could be room to enhance the allocation and trading of MIC so that MIC at highly valued branch groups does not go unused, potentially preventing additional resource adequacy contracting.</p> <p>Figure 1: Branch groups with non-zero bilateral prices and unused MIC – 2020 and 2021</p> <p>To meet future capacity needs and carbon reduction goals, it will also be important to ensure that MIC can be expanded to support long term contracts from out of state resources. Uncertainty about the availability of MIC or ability to secure MIC can introduce risk in engaging in long term contracts for external capacity if off-takers do not have certainty that they will be able to count the external capacity towards resource adequacy obligations for the duration of the contract.</p> <p>If uncertainty about the ability to secure MIC to support long-term contracts exists, then this could discourage LSEs from engaging in long term contracts for external capacity that are needed to support system reliability and state carbon reduction goals. This uncertainty could also limit competition for external capacity, diverting supply from California and limiting the pool of capacity eligible to serve California load. In order to facilitate long-term contracting for</p>	<p>The CAISO proposal will increase transparency of all available MIC allocations (by branch group) – including what is available for trading by each participant – and this in turn should increase trading opportunities.</p> <p>Currently LSEs have an opportunity to have a multi-year reservation, for the length of their contract, at the branch group of their choice as long as their requests meets current Tariff and BPM requirements for New Use Import Commitment.</p>

<sup>3</sup> Comments on MIC Enhancements Straw Proposal, DMM, May 27, 2021, p. 2:  
<http://www.caiso.com/Documents/DMM-Comments-on-MIC-Enhancements-Straw-Proposal-May-27-2021.pdf>

<sup>4</sup> This chart includes branch groups with non-zero bilateral prices and unused MIC based on monthly resource adequacy supply plans, where more than two entities ultimately held MIC at the branch group.



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	<p>adequacy contracts lined up, mitigating to some extent the chance that resource adequacy already under contract could be stranded because the LSE was not able to obtain MIC.</p> <p>The ISO proposes to make the unallocated remaining import capability in step 13 available with priority to entities with resource adequacy contracts on a first-come, first-serve basis, instead of allocating any requests beyond the available MIC based on the amount of MIC requested as proposed by Six Cities. DMM supports Six Cities' proposal to allocate requests in excess of available MIC under this proposal based on volume of MIC requested instead of on a first-come, first-serve basis. An allocation based on MIC requested would allow for a more equitable distribution of limited MIC (since requesting entities would all have RA contracts lined up). This approach could also allow the ISO to gain insight into the actual demand for MIC at a certain tie and help the ISO identify highly requested branch groups.</p> <p><b>4. Tariff and BPM updates</b></p> <p>DMM supports the ISO's proposed Tariff and BPM changes to maintain consistency with the current practice of using two decimal places for RA requirements and showings. Current tariff language pertaining to bilateral MIC trades could create some confusion about what increments MIC can be traded in today.</p> <p><b>DMM supports the ISO continuing to consider approaches to modifying the MIC calculation to potentially increase MIC on branch groups which are highly demanded or highly utilized to support resource adequacy contracts.</b></p> <p>DMM agrees with stakeholder suggestions that there could be benefits to understanding whether reducing MIC on under-utilized branch groups could increase capacity on more highly traded interties and thus support additional resource adequacy contracting.</p> <p>As discussed in DMM's May 27 comments, MIC on some branch groups has gone unused between 2019 and September 2021 to support import resource adequacy. In 2021, the total MIC on these unutilized branch groups was about 430 MW. Additionally, there are branch groups where less than 50 percent of MIC has been used to support import resource adequacy throughout 2019 and 2021, amounting to about 975 MW of unused MIC (average of unused MIC on these branch groups in summer months between 2019 and 2021). This MIC was not used to support resource adequacy imports and was not traded</p>	<p>See response to 1e above.</p> <p>Thank you for your support.</p> <p>Deliverability is not transferable from one point on the grid to another. While some buses (scheduling points) may be close electrically to each other they may not be exactly behind the same constraints and they will have different effectiveness factors to each constraint on the grid.</p> <p>LSEs are not allowed to make requests at branch groups that have no Remaining Import Capability (RIC) after step 6 resulting in about half of the branch group being discriminated against. Furthermore the LSEs</p>



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	<p>bilaterally, suggesting that MIC on certain branch groups provided little value to LSEs in terms of meeting their resource adequacy requirements.</p> <p>The ISO suggests that stakeholders provide ideas on how the ISO would measure “liquidity” at a branch group to determine which branch groups could be increased or decreased. DMM suggests that the ISO could develop metrics on requests for MIC at certain branch groups in various steps in the MIC process to identify branch groups that are consistently over or underrequested.</p> <p><b>If bilateral trading of MIC is not improved by providing additional transparency alone, then the ISO could consider further enhancements.</b></p> <p>While DMM believes that providing additional transparency regarding MIC allocations and usage could help facilitate more bilateral trading of MIC, LSEs may continue to hold MIC or not offer MIC for sale. If trading and utilization of MIC is not improved by increasing transparency alone, then the ISO could consider further enhancements that could better facilitate MIC trading.</p> <p>The ISO has confirmed that external capacity can only be used for resource adequacy substitution for forced outages of external capacity.<sup>5</sup> An external resource shown for resource adequacy that goes on outage would also already have had MIC associated which could be used for substitute capacity for the resource. DMM has also observed that use of external resources for substitution purposes has not occurred in the past three years, so it does not appear that LSEs are regularly holding back MIC for substitution purposes. It appears that there may be other more significant reasons that entities are not offering excess MIC for sale. It could be helpful for the ISO to investigate further what barriers LSEs face that may prevent them from releasing excess MIC, and try to address those barriers directly.</p> <p>If trading of excess MIC is not improved by adding transparency alone, then the ISO could give further consideration to proposals that would require entities to release unused MIC, given there appears to be little benefit in holding MIC for substitution as the ISO originally posited. The ISO could give further consideration to developing a process by which LSEs with excess MIC are required to release unused MIC. The process could guarantee the LSE would be compensated at or above a specific price floor if another LSE procured the MIC. This could help ensure that other entries seeking MIC can have access to the excess capacity on the system.</p>	<p>that have ETCs, TORs and Pre-RA import Commitments above their load share ratio are not given RIC and therefore cannot make requests in subsequent rounds. Also, the CAISO considers stakeholder requests for Remaining Import Capability a “desired import location” to be of lower quality request compared with an actual energy schedule seen in real-time, where there is actual proof that a physical resource exists behind the energy transaction.</p> <p>The CAISO is willing to open another stakeholder process in the future if the proposed improvements achieved through this stakeholder process do not result in improved trading, especially when MIC allocations go unused.</p>

<sup>5</sup> ISO responses to stakeholder comments on MIC Enhancements straw proposal, May 13, 2021, p. 12:

<http://www.caiso.com/InitiativeDocuments/ISOResponsesToCommentsMaximumImportCapabilityEnhancementsStrawProposal.pdf>



No	Comment Submitted	CAISO Response
	<p>There could also be benefit in the ISO playing a larger role in facilitating trading of excess MIC to match counterparties. For example, under the current framework an LSE with demand for MIC at a specific branch group may have to transact and contract with several different LSEs for their small excess MIC positions. In this case, there are potentially significant transaction costs which could present barriers to trading excess MIC. These barriers and costs may be reduced by the ISO matching counterparties instead.</p> <p><b>Potential enhancements to MIC allocation</b></p> <p>As an alternative to enhancing processes for trading MIC after allocations take place, the ISO could further consider enhancing MIC allocation processes up front to give more priority access to MIC to entities with resource adequacy contracts in the year-ahead timeframe.</p> <p>Currently, LSEs with existing resource adequacy contracts can lock MIC for years forward but they are generally limited to how much MIC they can reserve by their load share of total MIC. DMM understands that load share restrictions could still be limiting in terms of reserving MIC for LSEs that rely heavily on pseudo-tied or dynamically scheduled capacity to meet resource adequacy requirements, particularly for small LSEs whose share of total MIC may be very small.</p> <p>The ISO could give further consideration to allowing LSEs to nominate MIC in excess of load share in the year-ahead timeframe, and potentially transferring MIC above an LSEs' load share between parties (i.e. LSEs with high load share to LSEs with lower load share) at a TAC-based rate.</p>	<p>Future improvements could include a trading platform for matching buyers and sellers.</p> <p>LSEs that have ETCs, TORs and Pre-RA Import Commitments above their load share quantity have known this fact for a very long time and should have dedicated all their energy in signing RA contracts with resources located inside the CAISO, rather than trying to find willing sellers of RIC year after year.</p> <p>LSEs can currently trade RIC before it is allocated to a certain branch group, part of step 8 (trading). Trading data, including cost, is made public.</p> <p>At this time, the CAISO does not favor "forced trading", however it is willing to considerate it if everything else fails to improve trading.</p>
4b	<p><b>2. Provide your organization's comments on the improve transparency topic, as described in section 4.1:</b></p>	
4c	<p><b>3. Provide your organization's comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b></p>	
4d	<p><b>4. Provide your organization's comments on the MIC Capability expansion topic, as described in section 4.3:</b></p>	
4e	<p><b>5. Provide your organization's comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b></p>	

No	Comment Submitted	CAISO Response
4f	6. Provide your organization's comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:	
4g	7. Provide your organization's comments on other issues that require further exploration, as described in section 4.6:	
4h	8. Provide your organization's comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:	
4i	9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:	



5. Northern California Power Agency (NCPA) Submitted by: Michael Whitney		
No	Comment Submitted	CAISO Response
5a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b> Please see item four (4) below:</p>	
5b	<p><b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b> No comments at this time.</p>	
5c	<p><b>3. Provide your organization’s comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b> No comments at this time.</p>	
5d	<p><b>4. Provide your organization’s comments on the MIC Capability expansion topic, as described in section 4.3:</b> NCPA is concerned about CAISO’s proposed solution to “collect [contractual] data and to make it available to the CPUC for preparation of the main portfolio.” This is seemingly in response to an issue identified by the Six Cities in their Straw Proposal comments; that CAISO incorrectly assumes that the “CPUC portfolio accounts for all loads including non-CPUC jurisdictional entities” and therefore “does not attempt to obtain information from non-CPUC jurisdictional LSEs regarding the external resource procurement plans” in policy-driven MIC expansion studies. NCPA is in agreement with Six Cities that CAISO should take the contracts of non-CPUC jurisdictional utilities into account in the TPP or the MIC process, assuming that the data required is narrowly tailored and appropriately safeguarded if commercially sensitive. However, NCPA does not understand CAISO’s rationale for providing the data to the CPUC.<sup>6</sup> CAISO is responsible for assuring that the total portfolio it considers is appropriate for the analyses it conducts, rather than delegating the function to the CPUC. The proposal also lacks clarity on what the CPUC would do with the data.</p>	<p>The CAISO agrees that the confidentiality of the data should be protected. Details to the process will be proposed in the next iteration of the paper to assure confidentiality of data.</p>

<sup>6</sup> NCPA notes that it is not clear that the CPUC even has a need for the data or that it intends to include the data in its portfolio.

No	Comment Submitted	CAISO Response
	NCPA concurs that CAISO should address the issue identified by the Six Cities, but the proposal to do so is lacking in important details and should be reconsidered.	
5e	<b>5. Provide your organization's comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b> No comments at this time.	
5f	<b>6. Provide your organization's comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b> No comments at this time.	
5g	<b>7. Provide your organization's comments on other issues that require further exploration, as described in section 4.6:</b> No comments at this time.	
5h	<b>8. Provide your organization's comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b> No comments at this time.	
5i	<b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b> No comments at this time.	



6. Pacific Gas & Electric (PG&E) Submitted by: Connor Valaik		
No	Comment Submitted	CAISO Response
6a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b>            PG&amp;E supports the implementation of the following items proposed in the revised straw proposal:</p> <ul style="list-style-type: none"> <li>• Additional transparency during the allocation and trading process and especially to the ownership and usage (after the allocation process ends).</li> <li>• Proposed improvements to step 13 of the allocation process.</li> <li>• Clarifications and clean-up of language in the Tariff and Business Practice Manual regarding standard use of two decimal places.</li> </ul>	<p>Thank you for your support.</p>
6b	<p><b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b>            PG&amp;E welcomes CAISO’s proposal to improve transparency of ownership and usage during the allocation and trading process. PG&amp;E supports CAISO’s proposal to make the following data publicly available through a web interface (or publishing):</p> <ul style="list-style-type: none"> <li>• Identify the most up-to-date owners of all MIC allocations at the branch group level – including MW quantity, contact person and “MWs available for trade”.</li> <li>• Aggregate usage by branch group level after validation of each month ahead and year ahead RA showing.</li> </ul> <p>PG&amp;E would welcome more transparency on the CAISO’s MIC assignment process by providing more explanation on the amount of assigned MIC to LSEs based on their individual request (Step 5 to 12). We recognize that the information could be confidential and do not request that non-essential details on the allocation calculation be made public. However, the CAISO could provide a descriptive note to each LSE explaining the amount of MIC assigned compared to the MIC requested.</p> <p>The CAISO requests stakeholder opinion on how the aggregation should be done either for all LSEs or for CPUC jurisdictional LSEs versus non CPUC jurisdictional LSEs. PG&amp;E has no preference at this stage. However, PG&amp;E would welcome any clarifications that the CAISO could share explaining if there would be useful insights by separating the import rights out by CPUC vs non-CPUC jurisdictional LSEs.</p>	<p>Thank you for your support.</p> <p>The CAISO already provides this information in steps 10 and 12 in response to requests in steps 9 and 10. In the response emails, the CAISO informs each LSE of how much allocation was requested and how much was assigned per scheduling point. The LSEs are also reminded in those emails of how much remaining import capability they have and how the allocation process works if a scheduling point was over-requested (based on the load share ratio). Providing more information could expose confidential data.</p>

No	Comment Submitted	CAISO Response
6c	<p><b>3. Provide your organization's comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b></p> <p>PG&amp;E appreciates the clarifications the CAISO provided on the deliverability studies for internal resources as well as imports (assumptions, studies, existing transmission constraints, deliverability protection etc.) in the previous proposal. PG&amp;E has further questions raised in the below section.</p>	<p>Thank you for your support.</p>
6d	<p><b>4. Provide your organization's comments on the MIC Capability expansion topic, as described in section 4.3:</b></p> <p>On the inclusion of contractual data from non-CPUC jurisdictional LSEs into the main portfolio, PG&amp;E supports the proposal to have the ISO collect such data and to make it available to the CPUC for the preparation of the main portfolio.</p> <p>On the proposed new way for MIC expansion, the CAISO should clarify what aspects of the MIC expansion consists of an increased MIC availability due to existing transmission capacity instead of a request to increase MIC capability with new grid upgrades.</p> <p>PG&amp;E has initial questions on the legitimate reasons for MIC expansion requests that the CAISO has proposed:</p> <ul style="list-style-type: none"> <li>• What type of existing import contract will the CAISO consider a legitimate reason? Could the Western Systems Power Pool (WSPP) Schedule C (or contractually equivalent) firm energy contract be a legitimate reason?</li> <li>• On the second reason – why would the new transmission not automatically generate a MIC availability expansion?</li> </ul> <p>As pointed out by the ISO, PG&amp;E believes this requires further discussion and should be addressed in a broader context of existing initiatives or a new initiative.</p> <p>PG&amp;E also believes the CAISO could consider a process similar to the Distributed Generation Deliverability (DGD) study for import. As expressed by some stakeholders in their comments to the straw proposal (i.e. Six Cities, and Southwestern Power Group (SWPG), Pattern Energy and Valley Electric Association), the CAISO could consider adding a planned import resources study process. This new study could also help address the asymmetry of data quality between CPUC versus non-CPU jurisdictional LSEs. This process could</p>	<p>Thank you for your support.</p> <p>A legitimate RA contract that meets the definition and requirements of both the CAISO and the applicable Local Regulatory Agency will be considered.</p> <p>The new transmission “at the CAISO boundary” will not create MIC because the bottleneck is downstream (generally inside the CAISO system).</p> <p>A process similar the DGD process already exists for import. The DGD process is directly tied to the amount of the system connected distributed generation in the ISO Transmission Plan renewable portfolios that come from the CPUC IRP resource plan. Similarly, the current Expanded MIC process is also tied to the ISO Transmission Plan renewable portfolios (i.e. the amount of scheduled imports into the ISO BAA in the ISO Transmission Plan renewable portfolios).</p>

No	Comment Submitted	CAISO Response
	<p>leverage some of the components of the existing DGD process that allocates available deliverability to LSEs to allocate based on meeting eligibility requirements. Additionally, a MIC expansion process could be created similar to the existing GIDAP that outlines a clear path for resources to obtain deliverability either through the TPP approved upgrades or self-funding upgrades.</p> <p>On the other ways for MIC expansion, the CAISO recaps in the MIC expansion section that starting this year the LSEs have an opportunity to obtain multi-year reservation of their MIC allocations at certain branch groups based on their new contracts. In the MIC stabilization and multi-year allocation the CAISO conducted last year, the CAISO was proposing a phased approach on the type of new contracts that could lock MIC on a multi-year basis. The phase one currently in place limits eligible contracts to count for New Use Import Commitment to pseudo-tie or dynamic scheduled resources. PG&amp;E wonders if the CAISO considers updating the types of resources that could be eligible to count for New Use Import Commitment.</p>	<p>At this time, the CAISO is not considering changing existing Tariff and BPM requirements for qualification as a New Use Import Commitment.</p>
6e	<p><b>5. Provide your organization’s comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b></p> <p>PG&amp;E does not oppose the revision of step 13 of the MIC allocation process to give priority to existing contract. The CAISO requests stakeholder to specify if the ratio of MW requested vs MW available is preferred over first come first served, PG&amp;E does not have any preference.</p>	<p>See response at 1e above.</p>
6f	<p><b>6. Provide your organization’s comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b></p> <p>PG&amp;E supports the CAISO’s proposal to revise the current tariff language that limits bilateral MIC transfers to MW increments to better align with the Reliability Requirements BPM requiring that all RA requirements, transactions, and showings are done to two decimal places.</p>	<p>Thank you for your support.</p>
6g	<p><b>7. Provide your organization’s comments on other issues that require further exploration, as described in section 4.6:</b></p> <p>PG&amp;E supports the CAISO’s decision to not move forward with the proposals of 1. Conduct deliverability studies at the end of the RA showings process; 2.</p>	<p>Thank you for your support.</p>

No	Comment Submitted	CAISO Response
	Incorporate an auction or other market-based mechanism into the assignment process; and 3. Recapture and then release the unused MIC allocations.	
6h	<b>8. Provide your organization’s comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b> No comments.	
6i	<b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b> No comments.	







No	Comment Submitted	CAISO Response
	SRP supports the CAISO's proposal to address the framework and process to submit requests for customer-paid transmission upgrades outside of this initiative.	Thank you for your support.
7e	<b>5. Provide your organization's comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b> No comments at this time.	
7f	<b>6. Provide your organization's comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b> SRP supports the CAISO's proposal to update the Tariff and Reliability Requirements Business Practice Manual to be consistent with FERC approved practice.	Thank you for your support.
7g	<b>7. Provide your organization's comments on other issues that require further exploration, as described in section 4.6:</b> No comments at this time.	
7h	<b>8. Provide your organization's comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b> SRP is concerned about the timing of this initiative creating challenges for effective coordination with the ELFSRP initiative. The CAISO has ensured stakeholders that it will coordinate between MIC Enhancements and ELFSRP; however, the timing of the initiatives may make that coordination difficult. SRP suggests the CAISO consider phasing the MIC Enhancements as described below and in answer 1 above. The schedule for the MIC Enhancements initiative includes the final proposal in October and CAISO Board of Governors (Board) consideration in November 2021 – the plan does not include any phases. Under the current schedule, the CAISO would implement MIC enhancements in spring 2022 for Resource Adequacy (RA) compliance year 2023. The ELFSRP initiative currently includes two phases: <ul style="list-style-type: none"> <li>• Phase 1 for near-term enhancements that would be finalized for Board consideration in March 2022 and implementation in summer 2022</li> <li>• Phase 2 for a long-term framework that would be finalized for Board consideration in May 2022 and implementation in January 2024</li> </ul>	Your comments have been noted. The CAISO is considering using a phased approach going forward.

No	Comment Submitted	CAISO Response
	<p>SRP is concerned about the timing differences in these initiative plans because the MIC Enhancements initiative is moving to completion much sooner than even Phase 1 of the ELFSRP initiative. SRP requests that the CAISO consider the following phased approach for the MIC Enhancements Initiative:</p> <ul style="list-style-type: none"> <li>• Phase 1 for near-term changes included in the MIC Enhancements straw proposal that do not need to be closely coordinated with the ELFSRP initiative. Phase 1 could include: <ul style="list-style-type: none"> <li>◦ Improved MIC transparency</li> <li>◦ Updating Step 13 of the MIC process</li> <li>◦ MIC and deliverability process education</li> </ul> </li> <li>• Phase 2 that better aligns with the ELFSRP Initiative timing to ensure that work in the MIC Enhancements does not need to be redone or superseded by policies developed in the broader ELFSRP proposals. Phase 2 could include new options for MIC expansion: <ul style="list-style-type: none"> <li>◦ Ratepayer funded option presented in the MIC Enhancements revised straw proposal</li> <li>◦ Participant-funded/Third-party funded MIC expansion project also described in the revised straw proposal – as the CAISO indicated, any potential framework, process, and rights to use of the customer-paid transmission upgrades will all need to be considered in the larger context of other current initiatives or potentially a new stakeholder initiative and will not be developed through this MIC Enhancements initiative.</li> </ul> </li> </ul> <p>SRP respectfully asks the CAISO to identify those elements of the MIC Enhancements initiative that may directly or indirectly influence the ELFSRP initiative to make this stakeholder process transparent, and to consider the phasing in of those MIC elements so they align with the ELFSRP initiative timeline.</p> <p>Because the CAISO removed elements of this initiative associated with reservation of import capability and transmission for wheel-through transactions, SRP agrees that this initiative will not require a briefing of the EIM Governing Body. If the scope of this initiative evolves to include changes to rules governing the use of CAISO transmission or otherwise affect participation in EIM, SRP requests that the CAISO reconsider the EIM Governing Body role.</p>	



No	Comment Submitted	CAISO Response
7i	<b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b> No additional comments at this time.	



<b>8. Shell Energy</b> <b>Submitted by: Ian White</b>		
No	Comment Submitted	CAISO Response
8a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b></p> <p>Shell Energy appreciates the opportunity to comment on this revised straw proposal as CAISO seeks to increase transparency for the MIC process. Shell Energy suggests the CAISO work to align proposed enhancements to MIC along with some stakeholder suggestions in the proposed External Load Forward Scheduling Rights (ELFSR) process straw proposal comments which were recently submitted. Changes made in this stakeholder process should not foreclose opportunities for a durable solution to harmonization of transmission allocation in CAISO markets to external open-access transmission tariff (OATT) framework.</p> <p>In addition, the MIC revised straw proposal eliminates an important aspect which would promote competition for MIC allocation process—ensuring a mechanism for releasing under or unutilized MIC allocations is imperative.</p>	<p>Thank you for your comments.</p> <p>The CAISO will maintain close coordination of the two initiatives. The MIC enhancements initiative does not foreclose any solution proposed under the External Load Forward Scheduling Rights (ELFSR) initiative.</p> <p>This item can be revisited in future years if other current improvements to transparency and trading do not translate into reduction or elimination of unused MIC allocations at the time of high system need.</p>
8b	<p><b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b></p> <p>The improvements made to MIC transparency are welcome changes. Branch group aggregation should be expanded to include both CPUC jurisdiction and non-jurisdictional categories in reports.</p>	<p>Your preference has been noted.</p>
8c	<p><b>3. Provide your organization's comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b></p> <p>No comment.</p>	
8d	<p><b>4. Provide your organization’s comments on the MIC Capability expansion topic, as described in section 4.3:</b></p> <p>No comment.</p>	
8e	<p><b>5. Provide your organization’s comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b></p> <p>No comment.</p>	

No	Comment Submitted	CAISO Response
8f	<p><b>6. Provide your organization’s comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b> Shell Energy supports.</p>	<p>Thank you for your support.</p>
8g	<p><b>7. Provide your organization’s comments on other issues that require further exploration, as described in section 4.6:</b> Shell Energy is concerned the CAISO has unilaterally eliminated an additional item which sought to promote competition the MIC process—that is releasing under or unutilized MIC allocations. By not releasing surplus MIC rights, LSEs enjoying MIC surpluses can effectually decrease competition for import RA transactions or substitution. This barrier disadvantages other LSEs. This inefficiency is concerning as actual system capability is being unutilized simply for lack of a reallocation process. Instead, if under or unutilized MIC rights were released to the market for use, other entities could benefit from these released surplus MIC rights. The additional steps to increase transparency and support trading/exchange of MIC is not a substitute for reallocation of under or unutilized MIC rights.</p>	<p>See response to item 8a above.</p>
8h	<p><b>8. Provide your organization’s comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b> Given MIC framework affects the ability to serve CAISO native load with external resources, Shell Energy does not support the proposal to circumvent the EIM Governing Body from the approval process. This stakeholder process has overlaps with elements of ELFSR process; any eventual MIC enhancements should not foreclose opportunities for a durable long-term solution to harmonization of transmission allocation in CAISO markets to external OATT framework as part of ELFSR.</p>	<p>Your preference has been noted, however “serving CAISO native load” is the prerogative of the CAISO Board and not the EIM Governing Board. See response to item 8a above.</p>
8i	<p><b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b> No comment.</p>	

<b>9. Southern California Edison (SCE) Submitted by: Aditya Chauhan</b>		
<b>No</b>	<b>Comment Submitted</b>	<b>CAISO Response</b>
9a	<b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b>	
9b	<b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b>	
9c	<b>3. Provide your organization’s comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b>	
9d	<b>4. Provide your organization’s comments on the MIC Capability expansion topic, as described in section 4.3:</b> The MIC calculation should incorporate historical flows to more accurately reflect grid conditions. If a line has been on outage making it unavailable on the days that went into the MIC calculation, the resultant MIC may be underestimated due to the line outage. Therefore, the CAISO should do a look back to see when the line was in service and incorporate those flows into the MIC calculation.	An intertie de-rate or even an outage may not necessarily result in cuts to the energy schedules. If they do happen to result in cuts to the energy schedules then it just means this intertie is not as reliable as others during time of stressed system peak. Worst case scenario this will influence 25% (1 of the 4 points) used in the calculation. Since entire MIC needs to be simultaneous the CAISO should not substitute data from a different day just for this one branch group.
9e	<b>5. Provide your organization’s comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b>	
9f	<b>6. Provide your organization’s comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b>	
9g	<b>7. Provide your organization’s comments on other issues that require further exploration, as described in section 4.6:</b>	
9h	<b>8. Provide your organization’s comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b>	
9i	<b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b>	





10. Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (Six Cities) Submitted by: Margaret McNaul		
No	Comment Submitted	CAISO Response
10a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b></p> <p>The Maximum Import Capability (“MIC”) Enhancements Revised Straw Proposal includes several incremental enhancements to the MIC framework that the Six Cities hope will result in some increase in the availability of MIC for additional Resource Adequacy (“RA”) Imports. In particular, the Six Cities very much appreciate the CAISO’s willingness to modify Step 13 of the MIC allocation process to provide a priority for existing RA contracts in that step of the process. In addition, the Six Cities support elements of the Revised Straw Proposal (a) seeking to improve transparency in the allocation and use of MIC and to enhance opportunities for trading of MIC and (b) outlining on a preliminary basis a process for considering stakeholder requests to expand MIC at specific branch groups. However, as described in greater detail in Item 4 below, the Six Cities are disappointed that the CAISO has not responded to previous suggestions by the Six Cities that availability of MIC be expanded on an interim basis to reflect temporarily unused deliverability reserved for resources internal to the CAISO Balancing Authority Area (“BAA”) that are not in operation.</p>	<p>Thank you for your support.</p> <p>For next RA year, the CAISO only reserves deliverability for resources that are supposed to be operational by 8/31 of the next RA year. Deliverability is not reserved for any other new resources COD or COM after 8/31 of the next RA year.</p>
10b	<p><b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b></p> <p>The Six Cities support the measures to enhance transparency with respect to the allocation and usage of MIC allowances as proposed in section 4.1 of the Revised Straw Proposal. In terms of the CAISO’s request for stakeholder input on whether aggregated usage data should distinguish between aggregated usage by CPUC jurisdictional LSEs and non-CPUC jurisdictional LSEs or provide single aggregated numbers (by branch group) for all LSEs, the Six Cities do not necessarily object to reporting usage information on a bifurcated basis as between CPUC and non-CPUC jurisdictional LSEs. However, the Six Cities do not necessarily perceive a benefit to such bifurcated reporting. The Six Cities therefore support reporting based on a single, aggregated number for each branch group.</p>	<p>Thank you for your support.</p> <p>Your preference has been noted.</p>

No	Comment Submitted	CAISO Response
10c	<p><b>3. Provide your organization’s comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b></p> <p>The Six Cities have no comments on educational topics at this time.</p>	
10d	<p><b>4. Provide your organization’s comments on the MIC Capability expansion topic, as described in section 4.3:</b></p> <p>The Six Cities support consideration of contractual data from non-California Public Utilities Commission (“CPUC”) jurisdictional load-serving entities (“LSEs”) in the formulation of the resource portfolio that the CAISO evaluates as part of the Transmission Planning Process (“TPP”) to determine whether sufficient import capability exists to deliver new projected import contracts in furtherance of state policy goals. However, the Six Cities have concerns with the CAISO’s proposal, as described in section 4.3, sub-section 1 at page 15 of the Revised Straw Proposal, simply to collect data from non-CPUC-jurisdictional LSEs and turn it over to the CPUC. For example, it is not clear to the Six Cities why consideration of import contracts anticipated by non-CPUC-jurisdictional LSEs would require “subtractions” from the CPUC main portfolio to “make room for the actual non-CPUC jurisdictional contracts” if the CPUC main portfolio does not include such non-CPUC-jurisdictional contracts in the first place. More importantly, it is the CAISO’s responsibility to ensure that its TPP addresses the needs of all LSEs that rely upon the CAISO Controlled Grid, not just those that are subject to the jurisdiction of the CPUC. Simply collecting data from non-CPUC-jurisdictional LSEs and turning it over to the CPUC does not fulfill that responsibility.</p> <p>With respect to future “state” and/or “renewable area” totals versus branch group split of actual RA import contracts as discussed in sub-section 2 of section 4.3 of the Revised Straw Proposal, the CAISO’s assumption that the problem of some branch groups being oversubscribed and others being undersubscribed will self-correct as a result of the opportunity to secure multi-year reservations of MIC allocations appears unsupported and in any event fails to address the needs of non-CPUC-jurisdictional LSEs to the extent they are not considered in the portfolios studied in the TPP.</p> <p>The Six Cities very much appreciate the CAISO’s recognition in sub-section 3 of section 4.3 of the Revised Straw Proposal that there is “a need to provide an avenue” for stakeholder requests to expand MIC at specific branch groups. As</p>	<p>See response at item 5d above.</p> <p>The CAISO current understanding it that the CPUC portfolio includes future renewable needs for all LSEs including non-CPUC jurisdictional LSEs.</p> <p>The CAISO intention was to explain that the problem will be self-correcting going forward now that all the contractual data is public. The needs for current RA contracts (not already Pre-RA Import Commitments or New Use Import Commitments) may be solved through MIC expansion request as stated in you next paragraph below.</p>

No	Comment Submitted	CAISO Response
	<p>the Six Cities understand the broad outline for such a process as set forth in sub-section 3, the first step would consist of a deliverability analysis to evaluate whether existing facilities could support MIC expansion to accommodate a specific request, similar to the assessments that are made with respect to ability to accommodate anticipated imports from a resource area included in a resource portfolio, but focused at the branch group level. If the deliverability analysis indicates that existing facilities could not support the requested expansion of MIC, subsequent steps would include the ability to request (and initially pay for) a facility study to identify upgrades that could support the requested expansion of MIC. At this time, important details regarding the CAISO's conceptual proposal for addressing MIC expansion requests are lacking, and the Six Cities do not necessarily agree with all of the elements of the CAISO's process that are outlined in sub-section 3. In particular, certain criteria, including how the CAISO will evaluate whether stakeholders have "legitimate reasons" for seeking an expansion in MIC or when it is in "the best interest of the ISO ratepayers" for a MIC expansion project to advance, require additional stakeholder discussion. The Six Cities look forward to working with the CAISO and other stakeholders to develop further the process for addressing MIC expansion requests. Relatedly, the Six Cities request that the CAISO clarify the portions of this topic that the CAISO believes require further stakeholdering in a future initiative – is it the CAISO's intent that the entire concept and process for requesting MIC expansions be subject to a further or separate stakeholder process, or is the CAISO's position that only the details of customer-funded MIC expansions require further stakeholdering in a separate stakeholder process? In either case, the Six Cities urge the CAISO to move forward on development of the details of these proposals so that they can be implemented as expeditiously as possible.</p> <p>As noted in the summary section above, Six Cities are disappointed that the CAISO has not responded to previous suggestions by the Six Cities that availability of MIC be expanded on an interim basis where reservations of deliverability for resources internal to the CAISO BAA that are not in operation permit. The Six Cities' previous comments in this initiative included the recommendation that the CAISO allow "Interim MIC" or "Short-Term MIC" up to the quantities of new internal resources shown as deliverable in the most recent deliverability analysis that are not yet in service. Such "Interim MIC" expansions also could include deliverability that is being preserved for</p>	<p>Correct.</p> <p>While the CAISO agrees in principle with the concept, the customer funded pay for studies and transmission expansion (non-TAC recovery) will have to be moved forward through a new (or different) stakeholder process.</p> <p>For ratepayer paid studies and upgrades the details will follow in the next proposal part of this stakeholder process.</p> <p>Details of customer-funded MIC expansions require a separate stakeholder process.</p> <p>See response to item 10a above.</p> <p>This proposal is closely related to the External Load Forward Scheduling Rights Process initiative, and would need to be considered in conjunction with that initiative.</p>

No	Comment Submitted	CAISO Response
	<p>resources that have ceased operation but are planning to repower or return to operation after upgrades. Reservations of deliverability for non-operational resources appear to persist for multiple years, and allowing interim use of such deliverability could accommodate additional RA imports that would contribute to reliability during the span of the reserved but unused deliverability. The CAISO has received FERC approval in Docket No. ER21-1536-000 for changes adopted through the Market Enhancements for Summer 2021 Readiness initiative to permit temporary grants of deliverability status to new internal resources under what appears to be an approach that also could apply to MIC. Such a process for granting Interim MIC allowances also could be included as an element of addressing specific MIC expansion requests.</p>	
10e	<p><b>5. Provide your organization’s comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b>            The Six Cities appreciate the CAISO’s inclusion of the Six Cities’ proposed modification to Step 13 of the allocation process and support its inclusion in the Revised Straw Proposal.            With respect to the CAISO’s proposal that allocations at this step be based on a “first come, first served” principle, the Six Cities request that the CAISO reconsider this approach. Instead, if two or more LSEs have RA contracts that exceed the amount left after Step 12 on any branch group, then the Six Cities propose that each LSE making “same day priority” requests based on existing RA contracts receive an allocation that is proportional to the RA contract quantities supporting their respective requests. For example, if there is 100 MWs of MIC remaining, and two LSEs – one with an 80 MW existing RA contract and one with a 60 MW existing RA contract – each request MIC at this step, each LSE would receive an allocation, with the first LSE receiving 57 MW and the second LSE receiving 43 MW.</p>	<p>Thank you for your support.</p> <p>See response to item 1e above.</p>
10f	<p><b>6. Provide your organization’s comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b>            The CAISO’s proposal to align provisions of the Tariff and BPMs to consistently show numerical amounts to two decimal places seems reasonable.</p>	<p>Thank you for your support.</p>
10g	<p><b>7. Provide your organization’s comments on other issues that require further exploration, as described in section 4.6:</b></p>	

No	Comment Submitted	CAISO Response
	<p>With respect to the discussion in the Revised Straw Proposal (at page 18) regarding evaluation of possible changes in the methodology for calculating MIC, it appears that the CAISO is either unwilling or unable to propose approaches that, short of specific MIC expansion requests as discussed above, will increase overall quantities of available MIC. There seems to be a disconnect between the CAISO's perception of MIC availability and usage versus some LSEs' perceptions of MIC availability and usage, particularly with respect to smaller LSEs that may receive shares of MIC that are commercially challenging to use.</p> <p>The Six Cities urge the CAISO to consider studying MIC expansions at branch groups that tend to be fully subscribed, potentially as a sensitivity in the TPP. This study could entail an increase in MIC by a certain percentage or certain quantity of MWs and would culminate in an assessment of the cost of needed upgrades to accomplish the MIC expansion at the relevant groups. This would enable stakeholders – particularly the CAISO LSEs that are responsible for funding the upgrades – to weigh in on whether expanding the MIC is a worthwhile use of ratepayer funds and/or could be accomplished economically.</p> <p>This proposal for an annual study (or a study at another required interval, such as every other year) of potential MIC expansion as part of the TPP would help mitigate the current situation, where the CAISO effectively (and on a basis that generally appears to be permanent) caps the amount of available MIC at historic usage levels. It would also provide stakeholders with an idea of what MIC expansion may cost relative to the cost of internal RA resource procurement.</p> <p>If the CAISO believes that periodically studying potential MIC expansions would be infeasible, the Six Cities request that the CAISO explain its reasons. To be clear, the Six Cities do not believe that the need to develop criteria, assumptions, or parameters for these studies should constitute a reason not to conduct the studies.</p>	<p>A MIC expansion process already exists. The process starts in the TPP, where the ISO will first establish target Expanded MIC MW values for each intertie that will be sufficient to support RA deliverability for the MW amount of resources that will utilize each intertie for scheduling imports into the ISO BAA and that are included in the base case resource portfolio that will be used in the current TPP cycle for identifying policy-driven transmission additions and upgrades.</p>
10h	<p><b>8. Provide your organization's comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b></p> <p>The Six Cities support the CAISO's conclusion regarding the role of the EIM Governing Body. With respect to scheduling, the Six Cities continue to urge the CAISO to move forward expeditiously with this initiative to enable modifications</p>	<p>Thank you for your support.</p>



No	Comment Submitted	CAISO Response
	to the MIC methodology and allocation process to be implemented as soon as feasible.	
10i	<b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b> The Six Cities have no additional comments at this time.	



11. Southwestern Power Group (SWPG), Pattern Energy (“Pattern”) and Valley Electric Association, Inc. (VEA) Submitted by: Ravi Sankaran		
No	Comment Submitted	CAISO Response
11a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b>            Southwestern Power Group (“SWPG”), Pattern Energy (“Pattern”), and Valley Electric Association, Inc. (“VEA”) (the “Joint Parties”) appreciate the opportunity to comment on the CAISO’s Revised Straw Proposal in the Maximum Import Capability Enhancements stakeholder process.</p>	<p>Thank you for your comments.</p>
11b	<p><b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b>            The Joint Parties agree with the CAISO’s proposal to increase transparency by providing the MIC ownership and usage data as described on p. 14 of the Revised Straw Proposal, and for the usage data we would support the breakdown by CPUC and non-CPUC jurisdictional LSEs. The CAISO should provide transparency for all entities holding MIC allocations, including those entities who are located outside the CAISO BAA.            In addition, the Joint Parties propose that the CAISO disclose which branch groups are “over requested” during the 13-step process and by how many MWs. For example in steps 4a, 4b, 9, 11, and 13 there is the potential for branch groups to be over requested and for LSEs to receive less than their desired amount. In these cases it would be helpful for stakeholders to know which branch groups are over requested and by how many MWs so they can plan accordingly.            The Joint Parties are concerned that transparency alone will not produce liquidity in the MIC market. Today, the LSEs who hold MIC allocations are generally known, but it is difficult, if not impossible, to purchase MIC in certain months. Please refer to question #7 for further suggestions to alleviate these problems.</p>	<p>Thank you for your support.</p> <p>The import rights of non-CAISO entities are now public at:  <a href="http://www.caiso.com/Documents/Step6-2022ContractualData.xlsx">http://www.caiso.com/Documents/Step6-2022ContractualData.xlsx</a></p> <p>The CAISO does not view this data as relevant for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Steps 4a and 4b cannot result in “over requests” since these represent a known quantity of Pre-RA IC and New Use IC.</li> <li>2. Steps 9 and 11 are only open for requests to LSE with allocated Remaining Import Capability (not to all LSEs) and only apply to branch groups that are not completely locked already (in steps 2-5).</li> <li>3. Step 13 represents branch groups that no LSE wants in steps 9 and 11; their over-subscription is not meaningful.</li> </ol> <p>Your concern has been noted.</p>
11c	<p><b>3. Provide your organization’s comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b>            The Joint Parties have no comments on this section.</p>	



No	Comment Submitted	CAISO Response
11d	<p><b>4. Provide your organization’s comments on the MIC Capability expansion topic, as described in section 4.3:</b></p> <p>The Joint Parties thank the CAISO for acknowledging the need for additional MIC expansion opportunities as expressed by multiple stakeholders and for proposing solutions. Our comments are organized by sub-section of section 4.3.</p> <p>First as a general observation under “Policy driven MIC expansion” the following is stated on p. 14 regarding any new policy-driven transmission upgrades needed: (emphasis added)</p> <p>“If deliverability is not available then new transmission projects are proposed and approved in order for the MIC expansion to take place. In this case the expansion of MIC has to wait until after the transmission projects are in-service.”</p> <p>The Joint Parties simply emphasize the need for advance planning for MIC expansion whether occurring through the current policy-driven process or the new proposed request process. Due to the potential delays in granting MIC expansion, it is important that requests be considered and studies conducted well in advance of the year needed rather than only in the year immediately prior.</p> <p>1. Inclusion of contractual data from non-CPUC jurisdictional LSEs</p> <p>The Joint Parties appreciate the CAISO addressing this concern which was raised by multiple stakeholders. We agree with the CAISO’s proposal for it to collect contractual data from the non-jurisdictional LSEs and combine with similar data received in the CPUC portfolio. The Joint Parties would also advocate giving the non-CPUC jurisdictional LSEs the opportunity (but not necessarily the obligation) to provide future planned import resource data to the CAISO for resources anticipated but not yet under contract, since as mentioned any MIC expansion triggered by such resources may require long lead-times to implement. Since the CAISO would receive such future planned import data in the CPUC portfolios for the CPUC-jurisdictional LSEs, it should also have access to similar data from the non-CPUC LSEs to plan accordingly for their import resource needs. Given the long lead times to develop new projects which will increase available MIC, the CAISO should create a mechanism to allow development of new resource portfolios that include non-CPUC jurisdictional LSEs’ RA resources as soon as possible. While the CAISO and CPUC have indicated an intention to do so, the Joint Parties have no basis to</p>	<p>Inclusion of non-CPUC jurisdictional LSEs contractual data into the base policy portfolio should accomplish this scope.</p> <p>The item will be included in the draft final proposal.</p>



No	Comment Submitted	CAISO Response
	<p>believe that all LSEs' resource portfolios have been included in the portfolios recently proposed by the CPUC to be used in the CAISO's next TPP.</p> <p>2. Future "state" and/or "renewable area" totals vs branch group split of actual RA import contracts</p> <p>In this sub-section, the CAISO describes the process for an LSE to secure the RIC needed for an RA contract at a given branch group when the branch group is different from that indicated by the CPUC portfolio for the respective "state" or "renewable area". The main point here is that in order for the LSE to secure the unlocked RIC as described here, there would need to be sufficient RIC MW available at the desired branch group to meet the anticipated RA contract need, which only reinforces the need for additional MIC expansion opportunities (see following sub-section).</p> <p>3. LSE requests to increase import capability at specific branch groups</p> <p>In this sub-section, the CAISO proposes to allow requests for MIC expansion from stakeholders with legitimate reasons or meeting certain criteria. The Joint Parties propose the following as criteria for stakeholders to make such requests:</p> <ul style="list-style-type: none"> <li>a. LSEs with existing RA import contracts;</li> <li>b. LSEs with expiring pre-RA import allocations (in situations where MIC at a particular branch group would otherwise be reduced);</li> <li>c. Owners of new transmission facilities connecting to the ISO grid from an external BAA; or</li> <li>d. Owners of new transmission facilities or import generation with firm point-to-point transmission service to the ISO grid from an external BAA.</li> </ul> <p>The Joint Parties also propose that the following provisions be incorporated in the new MIC expansion request and study process:</p> <ul style="list-style-type: none"> <li>a. Due to the potential long lead-time required to grant a MIC increase, stakeholders should be able to submit requests several years ahead of the year in which the MIC increase is needed. For example, a stakeholder could submit a request in 2022 for a MIC increase at a given branch group starting in 2025.</li> <li>b. On p. 16 CAISO states: "After studies are complete these requests can result in an increase in MIC if and when deliverability is available." In the event that deliverability is available but for less than the amount requested and/or at a later date than requested, the Joint Parties propose that CAISO fulfill the request partially. For example, if a stakeholder requests a 300MW increase at a given branch group starting in 2023, and CAISO determines that</li> </ul>	<p>Thank you for your specific proposal. The CAISO will start from your list and it will include the same level of specificity in the draft final proposal.</p> <p>Details to be included in the draft final proposal.</p>

No	Comment Submitted	CAISO Response
	<p>there is deliverability available to increase by 200MW starting in 2024, then CAISO should grant the partial increase and specify a date when the full increase can be granted, or allow the stakeholder to pay for a facility study for the amount that could not be granted.</p> <p>c. Similar to b), if CAISO conducts a facility study and determines that part of the MIC increase can be granted through upgrades that CAISO considers “economic or in the best interest of the ISO ratepayers”, then CAISO should grant the partial increase.</p> <p>d. The criteria for which upgrades will be considered “economic or in the best interest of the ISO ratepayers” should be made transparent before the new process is implemented and preferably during this stakeholder process itself.</p> <p>e. The CAISO should implement an aggressive timeline for implementing the MIC expansion program, given the fact that additional MIC is needed now.</p>	
11e	<p><b>5. Provide your organization’s comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b></p> <p>The Joint Parties agree with the proposed change to give LSEs with existing RA contracts priority for obtaining unallocated RIC during step 13, but with two modifications.</p> <p>As stated by CAISO in the Revised Straw Proposal and the August 11 stakeholder call if two or more LSEs have RA contracts that exceed the amount left after step 12 on any branch group, then CAISO proposes that the assignment go to the request received first (earliest) and so on until all MWs have been assigned. This approach seems arbitrary in that one LSE could grab all the MWs for its RA contract by simply having faster mouse-clicking speed than another. Instead, we would advocate for the MWs to be assigned in proportion to the size of each requestor’s RA contract using the method proposed by Six Cities in their comments since this approach seems more objective and equitable.</p> <p>The CAISO should also consider giving priority to RA contracts with longer terms (i.e. greater than or equal to X years) over contracts with shorter terms. By encouraging longer term contracts, the CAISO will ensure a stable supply of imported RA resources.</p>	<p>Thank you for your support.</p> <p>See response at item 1e above.</p> <p>Proposal in this paragraph seems to contradict the proposal in the previous paragraph unless contracts are somehow grouped in different “age buckets” and then use MW request vs. MW available within the last served “age bucket”.</p>
11f	<p><b>6. Provide your organization’s comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b></p>	

No	Comment Submitted	CAISO Response
	The Joint Parties agree with this proposed change.	Thank you for your support.
11g	<p><b>7. Provide your organization’s comments on other issues that require further exploration, as described in section 4.6:</b></p> <p>The Joint Parties have comments on the following issues listed in this section:  <u>Change in methodology for calculating MIC</u></p> <p>Since CAISO is already proposing to reveal data on MIC ownership and usage, this information combined with the data on over-requested interties as mentioned in question #2 could help determine “liquidity” at branch groups and improve the MIC calculations per branch group going forward. For example, if branch group A has 100MW of MIC that is held but not used in RA showings but branch group B is over-requested by 100MW, then CAISO could take this information into account in future MIC calculations at these respective branch groups.</p> <p><u>Incorporate an auction or other market based mechanism into the assignment process</u></p> <p>As mentioned previously the Joint Parties are concerned that transparency alone will not produce liquidity in the MIC market, as the identity of many current MIC holders is already known but yet it is difficult and often impossible to purchase MIC in certain months. Therefore, the CAISO should consider developing incentives to selling (or disincentives from holding) unused MIC.</p> <p><u>Recapture and then release the unused MIC allocations</u></p> <p>The Joint Parties support the comments of the CAISO Department of Market Monitoring (DMM) that are being filed in this round of comments. DMM points out that external RA resources have not been used for resource substitution in the past three (3) years, and the CAISO has confirmed that external capacity can only be used for RA substitution for forced outages of external capacity. Therefore, it does not appear that resource substitution is the reason that unused MIC has been withheld from the market.</p> <p>DMM has observed that MIC on some branch groups has gone unused between 2019 and September 2021 to support import RA and in other branch groups less than 50 percent of MIC has been used to support import RA in this same period (refer to DMM’s comments for specific data). Since this MIC was not used to support RA imports and was not traded bilaterally, it provided no value towards meeting LSE RA requirements. Therefore, the Joint Parties strongly encourage the CAISO to develop a process by which LSEs with</p>	<p>See responses at items 11b and 4a above.</p> <p>Your concern has been noted.</p> <p>See response to item 4a above.</p>

No	Comment Submitted	CAISO Response
	<p>excess MIC are required to release unused MIC at a specified price so that other entities seeking MIC can have access to the excess capacity on the system.</p>	
11h	<p><b>8. Provide your organization’s comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b>            The Joint Parties support the proposed initiative schedule and EIM Governing Body role, with the goal of presenting proposed changes to the CAISO Board of Governors in November 2021. Also, the CAISO should propose a timeline and proposed schedule for implementing the MIC expansion program, including any additional stakeholder process as indicated in Section 4.3.</p>	<p>Thank you for your support.</p>
11i	<p><b>9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal:</b>            The Joint Parties have no further comments on the Revised Straw Proposal and look forward to collaborating with the CAISO staff and other stakeholders on this important initiative.</p>	



12. Silicon Valley Power (SVP) Submitted by: Paulo Apolinario		
No	Comment Submitted	CAISO Response
12a	<p><b>1. Provide a summary of your organization’s comments on the Maximum Import Capability (MIC) Enhancements revised straw proposal:</b>            No comment at this time.</p>	
12b	<p><b>2. Provide your organization’s comments on the improve transparency topic, as described in section 4.1:</b>            SVP continues to believe improving transparency regarding ownership of MIC allocations and their use and availability will increase trading of import capability. Making the data available through a web interface by identifying the owners of all MIC allocations at the branch group level, including MW quantity available for trade along with the contact person would assist and improve the trading of import capability. Updating CIRA to facilitate the trading process would be beneficial to all users.            The data that is published should be the balance of each branch group level after validation of each month ahead and year ahead RA showing. If the remaining unused import capability is published along with the contact information of the MIC allocation owner, participants will be able to easily identify possible trading opportunities.            In response to the CAISO question, “Should the aggregation be by CPUC vs Non-CPUC jurisdictional LSEs or just a single aggregated number for all LSEs?” SVP believes there is no value in providing the disaggregated information by CPUC vs. Non-CPUC jurisdictional LSEs.</p>	<p>Thank you for your support.</p> <p>Your preference has been noted.</p>
12c	<p><b>3. Provide your organization’s comments on the education regarding deliverability of imports and internal resources topic, as described in section 4.2:</b>            No comment at this time.</p>	
12d	<p><b>4. Provide your organization’s comments on the MIC Capability expansion topic, as described in section 4.3:</b>            While SVP is supportive of providing data to improve modeling efforts and the efficiency of the MIC process, we are concerned about the additional administrative burden introduced along with the use of another entity to bypass limitations of jurisdiction. In this case, CPUC would be obtaining data for its</p>	<p>See response at item 5d above.</p>

No	Comment Submitted	CAISO Response
	<p>purpose through the introduction of new requirements by the CAISO. What's not clear is</p> <ol style="list-style-type: none"> <li>1. what new level of reporting will become mandatory</li> <li>2. what type of contract data will be collected</li> <li>3. will the data be aggregated or LSE-specific</li> <li>4. what protections will be provided to safeguard commercially sensitive data</li> </ol> <p>This proposal doesn't achieve any significant additional benefits and only serves as substituting the current procedure of "ISO changing or augmenting of the CPUC main portfolio since the ISO does not have visibility on what part of the main portfolio needs to be subtracted to make room for the actual non-CPUC jurisdictional contracts." For these reasons and concerns, SVP does not support including contractual data from non-CPUC jurisdictional LSE's.</p>	<p>Your preference has been noted.</p>
12e	<p><b>5. Provide your organization's comments on the Step 13 - give priority to existing RA contracts topic, as described in section 4.4:</b></p> <p>SVP is concerned with the first come first serve approach to allocating RIC due to the potential advantage it gives to larger staffed and financially incentivized organizations. The lack of resources/authority to follow through on contract continuity or performance to justify ownership of the MIC rights also opens up gaming opportunities. A deadline based, pro-rata approach may be more reasonable.</p>	<p>See response to item 1e above.</p>
12f	<p><b>6. Provide your organization's comments on the Tariff and Reliability Requirements BPM alignment of terms topic, as described in section 4.5:</b></p> <p>No comment at this time.</p>	
12g	<p><b>7. Provide your organization's comments on other issues that require further exploration, as described in section 4.6:</b></p> <p>Many of these issues still need to be explored in future MIC enhancements.</p>	
12h	<p><b>8. Provide your organization's comments on the proposed initiative schedule and EIM Governing Body role, as described in section 5:</b></p> <p>No comment at this time.</p>	



No	Comment Submitted	CAISO Response
12i	9. Additional comments on the Maximum Import Capability Enhancements revised straw proposal: No comment at this time.	