



## **Middle River Power Comments on Local Capacity Technical Study Criteria Straw Proposal**

**August 1, 2019**

Middle River Power (“MRP”) thanks the California ISO (“CAISO”) for the opportunity to submit these brief comments on the Local Capacity Technical Study Criteria (“LCT”) Straw Proposal dated July 11, 2019. MRP owns and/or manages approximately 2,000 MW of renewable and natural gas facilities in CA. We provide the following brief comments on the proposed change to the LCT planning standards.

### **MRP is supportive of the CAISO updating the LCT study criteria to align NERC, WECC and CAISO Mandatory Standards which have been implemented over time.**

MRP supports the CAISO’s current proposal in the LCT straw proposal dated July 11, 2019. MRP appreciates that the CAISO has maintained its position from the prior May LCT Criteria Update and continues to support a more detailed evaluation of a more stringent set of contingencies. As previously stated in prior comments, MRP believes the current misalignment between standards across CAISO studies creates inefficiencies from a planning perspective within the CAISO and across agencies. Utilizing the same standards will provide a clear understanding of the trade-offs between transmission, retirements, and replacement capacity especially in local and sub-local areas.

Overall, MRP continues to believe that aligning study assumptions improves transparency and will lead the most efficient and economic approach to local reliability which may include transmission upgrades, replacement capacity and/or maintaining existing resources.

MRP thanks the CAISO for the opportunity to participate in the LCT enhancement process.