



Stakeholder Comments Template

Maximum Import Capability Stabilization and Multi-year Allocation

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

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

Submitted by	Organization	Date Submitted
<i>Adeline Lassource 415.973.7004</i>	<i>Pacific Gas & Electric Company</i>	<i>June 11, 2020</i>

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

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

Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator's (CAISO) Maximum Import Capability (MIC) Stabilization and Multi-Year Allocation Revised Straw Proposal. PG&E appreciates the opportunity to comment on this issue and CAISO's efforts to advance the initiative.

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

1. Maximum Import Capability Stabilization

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

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

PG&E supports the short term improvement the CAISO proposes to calculate Maximum Import Capability for the next year RA by using the average of four hours, with no more than one hour per day, two hours in each one of the two years with the highest actual imports (when load is at or above 90% of that year's peak) among the past five years.

PG&E welcomes that the CAISO is willing to explore other alternatives to calculate MIC through this ongoing process for RA year 2022 implementation along with the multi-year MIC allocation.

2. Available Import Capability Multi-year Allocation Process

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

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

PG&E supports the concept of the "simplified Alternative 2" the CAISO proposes in the Second Revised Straw Proposal: Load share ratio always respected - single year allocation with multi-year lock at the branch group level.

Under this alternative, PG&E understands that it allows two ways of using the MIC allocated to LSEs. First (status quo), it maintains the current way of using the MIC allocated and let the possibility for LSEs to use MIC allocation to cover short term system RA shortfall, with no specific requirements of the applicable RA contracts. Second, it will also allow LSEs to lock MIC for an undetermined length of time for applicable RA contracts with the following criteria: the new contract used to lock MIC allocations should be either resource specific or an aggregation of specific resources and should cover a minimum of three summer months (between June-September).

PG&E would appreciate the CAISO provide additional examples demonstrating the method in which LSEs can lock in the MIC for applicable RA contracts, and the details on how this provides increased certainty to these LSEs.

PG&E appreciates the CAISO proposal to increase transparency around import contracts by proposing to make public information related to the LSE holder and locked up amounts, including expiration years, for each individual branch group.

Additional comments

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

No additional comments.