



Maximum Import Capability Enhancements

Straw Proposal

May 6, 2021

Intentionally left blank

Maximum Import Capability Enhancements Straw Proposal

Table of Contents

1.	Introduction	1
1.1.	Background	1
2.	Issue Paper: Maximum Import Capability Enhancements.....	3
2.1.	Technical issues related to MIC	3
2.2.	Improve transparency.....	5
2.3.	MIC allocation issues.....	5
2.4.	Reservation of import capability and transmission for wheel-through transactions.....	6
3.	Straw Proposal: Maximum Import Capability Enhancements.....	7
3.1.	Improve transparency.....	7
3.2.	Education regarding deliverability of imports and internal resources	8
3.3.	Other issues that require further exploration	11
4.	Stakeholder Engagement and EIM Governing Body Role.....	12
4.1.	Schedule.....	13
4.2.	Next Steps	14

Intentionally left blank

1. Introduction

The purpose of this initiative is to explore perceived shortcomings and potential improvements to all aspects of the Resource Adequacy (RA) - Maximum Import Capability (MIC) calculation, allocation, and usage.

MIC represents the maximum simultaneous deliverability of all imports used in the RA process. It does not influence the real-time energy schedules that are driven by market energy prices. The CAISO performs deliverability studies several times a year in its new Generation Interconnection Process (GIP) and in its Transmission Planning Process (TPP). These studies are conducted for the entire CAISO controlled grid, to test both the deliverability of internal resources and the deliverability of imports, in order to ensure that all resources are simultaneously deliverable to the aggregate of load. Unlike the deliverability of internal resources, which is granted on an ongoing basis to the resource owner, the deliverability of imports is granted to Load Serving Entities (LSEs) on an annual basis through an assignment process. New changes to the Tariff and Reliability Requirements Business Process Manual (RR BPM), when approved, will allow LSEs to lock Remaining Import Capability (RIC) at the branch group level on a multi-year basis subject to certain conditions.

Stakeholders have requested the CAISO review the MIC calculation, allocation and usage provisions. The CAISO is listing herein some of the most common issues raised by stakeholders. However during this stakeholder process the CAISO will also seek to explore other new issues and solutions raised during the stakeholder process itself.

1.1. Background

The CAISO assesses the deliverability for imports using the established MIC calculation methodology. The CAISO calculates the MIC MW amount mainly based on a historic methodology that utilizes the actual schedules into the CAISO's BAA for highest net imports obtained simultaneously during peak system load hours over two years with highest imports among the last five years. The CAISO examines the highest two years among the prior five years of historical import schedule data during high load periods. Sample hours are selected by choosing two hours in each year, and on different days within the same year, with the highest total import level when peak load was at least 90% of the annual system peak load. The CAISO then calculates the historically-based MIC values based on the scheduled net import values for each intertie, plus the unused Existing Transmission Contract (ETC) rights and Transmission Ownership Rights (TOR), averaged over the four selected historical hours. This concept is an important fundamental principle of the MIC framework, intended to ensure that existing ownership rights and pre-existing RA commitments and contracts should be recognized and respected.

MIC may be increased on a prospective basis at specific interties to meet state and federal policy goals with the completion of the related necessary policy-driven transmission upgrades. The CAISO assures, through deliverability studies, that both the increased MIC and internal generation are deliverable to the aggregate of load. If necessary, through the CAISO annual transmission planning process (TPP),

transmission upgrades are approved and subsequently built before the additional deliverability is made available to increased imports and new internal resources.

MIC values for each intertie are calculated annually for a one-year term and a 13-step process is used to allocate MIC to LSEs. MIC allocations are not assigned directly to external resources, rather they are assigned to LSEs who choose the portfolio of imported resources they wish to elect for utilization of their MIC allocations. This is also an important principle underlying the MIC framework. MIC is allocated to LSEs because LSEs pay for the cost of the transmission system as captive load and, thus, they should receive the benefits from it and choose which external resources are ultimately selected for providing RA capacity that relies on the import capability. Once the allocation process is complete, LSEs can use their MIC allocations on each intertie to support their procurement of RA capacity of external resources. The 13-step import capability allocation process is detailed further below.

Table 1 lists the 13 steps of the Available Import Capability Assignment Process.¹

Table 1: Available Import Capability Assignment process overview

Step	Process description
Step 1	Determine Maximum Import Capability (MIC)
	- Total ETC
	- Total ETC for non-ISO BAA Loads
Step 2	Available Import Capability
	- Total Import Capability to be shared
Step 3	Existing Contract Import Capability (ETC inside loads)
Step 4	Total Pre-RA Import Commitments & ETC
	- Remaining Import Capability after Step 4
Step 5	Allocate Remaining Import Capability by Load Share Ratio
Step 6	CAISO posts Assigned and Unassigned Capability per Steps 1-5
Step 7	CAISO notifies SCs of LSE Assignments
Step 8	Transfer [Trading] of Import Capability among LSEs or Market Participants
Step 9	Initial SC requests to CAISO to Assign Remaining Import Capability by Intertie
Step 10	CAISO notifies SCs of LSE Assignments & posts unassigned Available Import Capability
Step 11	Secondary SC Request to CAISO to Assign Remaining Import Capability by Intertie

¹ See Section 40.4.6.2.1 of CAISO Tariff.

Step 12	CAISO Notifies SCs of LSE Assignments & posts unassigned Available Import Capability
Step 13	SCs may submit requests for Balance of Year Unassigned Available Import Capability

RA showings designating import MWs to meet RA obligations across interties using either Non-Resource-Specific System Resources, Pseudo-ties, or Dynamically Scheduled System Resources are required to be used in conjunction with a MIC allocation and are considered a firm commitment to deliver those MWs to CAISO at the specified interconnection point with the CAISO system.

Reference for Tariff and business practice manual (BPM) as follows:

1. ISO Tariff section 40.4.6.2: <http://www.aiso.com/Documents/Section40-ResourceAdequacyDemonstration-for-SchedulingCoordinatorsintheCaliforniaISOBalancingAuthorityArea-Oct1-2020.pdf>
2. Reliability Requirements BPM sections 6.1.3.5, 6.1.3.6 and Exhibit A-3: <https://bpmcm.aiso.com/BPM%20Document%20Library/Reliability%20Requirements/BPM%20for%20Reliability%20Requirements%20Version%2054.docx>

2. Issue Paper: Maximum Import Capability Enhancements

As a result of the 2020 stakeholder process related to the Maximum Import Capability stabilization and multi-year allocation, the calculation of MIC has a more constant value across years (starting RA year 2021) and the Load Serving Entities (LSEs) are permitted to lock MIC at the branch group level based on multi-year executed RA import contracts (starting RA year 2022) under certain conditions.

During the stakeholder process last year stakeholders raised additional concerns and suggestions for improvements to the calculation of MIC as well as its allocation and tracking through the entire RA process. The CAISO is opening this stakeholder process in order to explore those stakeholder concerns and suggestions. The CAISO is not open to completely eliminating MIC or its allocation process, because the sum of the Total Transfer Capability (TTC) of each individual intertie is about 44,400 MW whereas MIC (simultaneous deliverability for all imports) is around 15,500 MW and the CAISO control area cannot physically receive imports beyond the simultaneous limit.

The following are descriptions of some of the stakeholder suggestions during the previous initiative.

2.1. Technical issues related to MIC

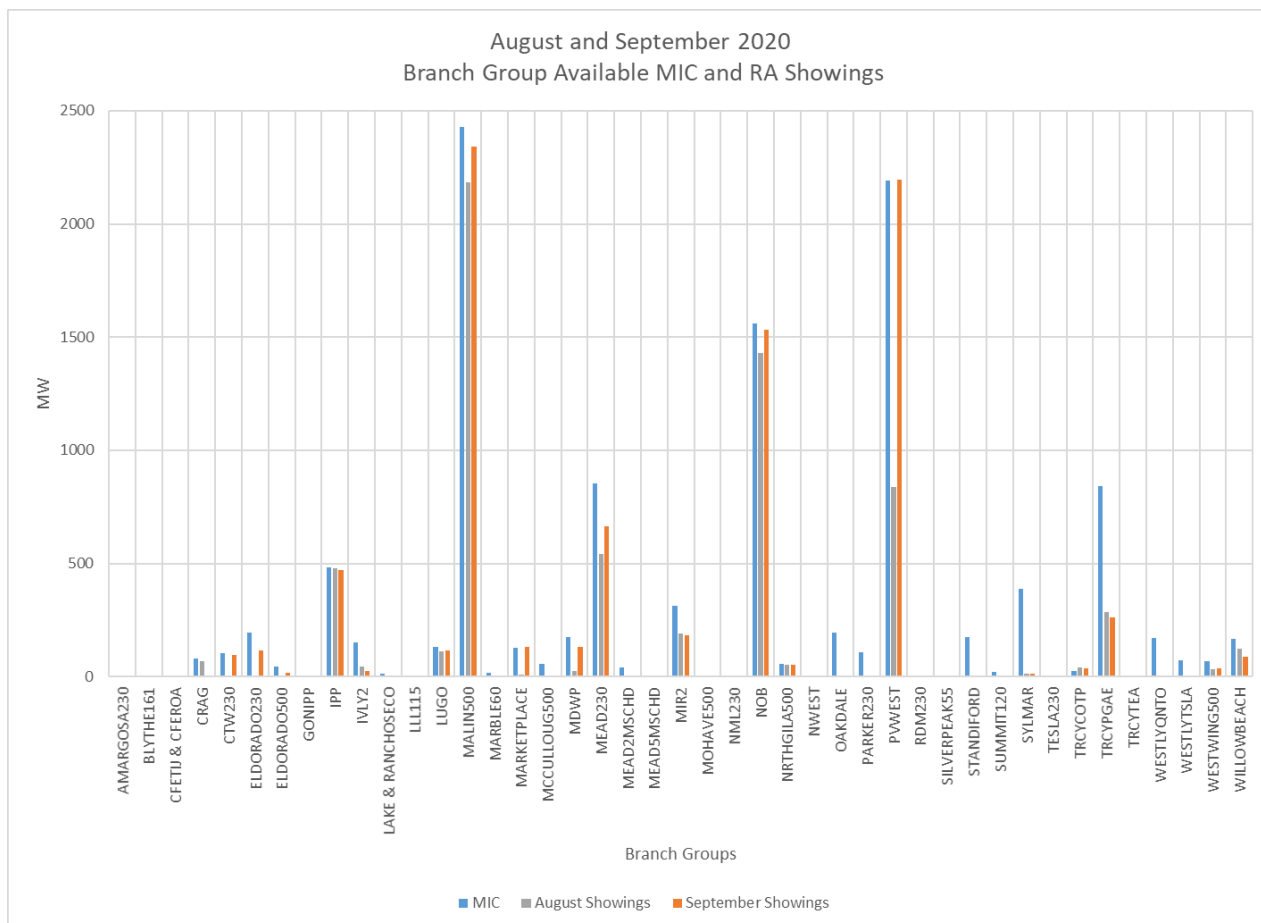
Change in methodology for calculating MIC:

Stakeholders suggested that there may be ways to improve the calculation by considering “liquidity” at certain branch groups (hubs) or considering the magnitude of RA showings. For example, branch groups

with high liquidity or high RA showings will be given additional MIC allocations in the next RA year and branch groups with low liquidity or low RA showings will have their allocations reduced in the next RA year. Figure 1 is a visual representation of the RA showings for the months of August and September 2020 in relation to the maximum import capability for each individual branch group and the discrepancy in RA showings usage between branch groups.

Challenges would arise from the fact that MIC is limited and if the allocation on a certain branch group is going up, another has to go down. Furthermore most branch groups have already reached their own deliverability limit, due to other CAISO internal resources interconnecting in the same general area.

Figure 1: Highest RA showings in relation to MIC allocated to CAISO internal LSEs



Conduct deliverability studies at the end of the RA showings process:

In order to avoid the MIC allocation process and to first allow LSEs to procure whatever RA imports they can, certain stakeholders suggested that the CAISO should run deliverability studies at the end of the RA process after all RA import contracts are known.

Challenges would include leaving LSEs with stranded assets, requiring far more time for year-ahead showings validation and possibly having high ramifications on CPM back-stop costs allocations regarding

system RA. It is not possible to do these proposed deliverability studies in the month ahead process because deliverability studies take over one month to conduct.

2.2. Improve transparency

Enhance ownership transparency of Import Capability allocations and their usage as well as the provisions for reassignment, trading, or other forms of sales of Import Capability among LSEs:

The CAISO remains open to changes that facilitate transparency regarding ownership of MIC allocations and its use, as well as increase LSE access to the trading of import capability.

The current process is transparent on each of the 13 steps of the MIC allocation process. The step by step data, including final allocation and bilateral trading, are published here:

<http://www.caiso.com/planning/Pages/ReliabilityRequirements/Default.aspx>

New Tariff language will also provide additional transparency by publishing relevant contractual data for resource contracts used to lock MIC at the branch group level on a multi-year bases.

Where transparency can be improved the most is during annual and monthly trading process and the actual usage after the showings are submitted and validated.

Improving the trading and usage aspect of the process may be necessary to better facilitate the transfer of Import Capability among LSEs and improve the efficient utilization of Import Capability.

2.3. MIC allocation issues

Incorporate an auction or other market based mechanism into the assignment process:

Stakeholders suggest that the CAISO incorporate an auction or other market based mechanism into the Available Import Capability Assignment process. They assert that this will provide alternatives or additional opportunities for LSEs to procure import capability greater than their pro-rata load ratio share of MIC on any given branch group/intertie to support a particular RA contract. Alternative mechanisms could allow for more efficient procurement of import capability by LSEs that place a greater value on the Import Capability for various reasons. The CAISO could allocate all, or only a portion of the remaining Available Import Capability through a mechanism similar to the current process, but the CAISO could retain all, or a portion of the remaining Available Import Capability, to be auctioned to or otherwise procured by LSEs. Additional auction revenues could potentially be used to reduce the TAC Transmission Revenue Requirement, or allocated back to LSEs on a pro-rata load share basis.

Challenges include the diminishing availability of year ahead Available Import Capability that needs to be allocated to LSEs after each LSE potentially exercises their right to lock multi-year Remaining Import Capability at the branch group level due to new RA contracts as established per last year's stakeholder process. Furthermore, there are significantly higher start-up and maintenance costs associated with such auctions as well as challenges regarding allocations of auction revenues.

Recapture and then release the unused MIC allocations:

Each LSE receives MIC allocations commensurate with their load share ratio and currently LSEs get to use them as they see fit. Some use them in the year-ahead timeframe, some in the month-ahead timeframe and some hold it for unit substitution (avoid RAAIM penalty).

Certain stakeholders suggest that unused allocations (after the month-ahead showings) should be recaptured and released to other LSEs.

Challenges arise from the fact that MIC is a traded commodity and a right that, once allocated, deserves just compensation. Additionally, some LSEs will not be able to avoid RAAIM (although this is not an issue after the elimination of RAAIM). Furthermore, all LSEs need to be RA compliant by T-45 days (monthly showing), and LSEs will have an incentive to come short in order to see if MIC gets released; otherwise a new timeline for all RA showings needs to be envisioned when time is set aside for the release of MIC every month before the showings are final.

2.4. Reservation of import capability and transmission for wheel-through transactions

Based on the recommendations from the *Market Enhancements for Summer 2021 Readiness* initiative, the CAISO will explore developing a process for requesting and reserving import capability and transmission to support wheel-through transactions across the CAISO system on a basis comparable to the allocation of import capability for delivery of Resource Adequacy (RA) imports to serve load in the BAA. This process will facilitate review of the scheduling priority for wheel-through transactions with reserved import capability and transmission across the CAISO system.

Other stakeholder proposed changes and improvements:

Please provide other suggestions related to the calculation of MIC or its allocation and tracking through the RA process.

Stakeholder Comments Received on the Issue Paper Topics

The CAISO has received comments from Bonneville Power Administration (BPA), Brookfield Renewable Trading and Marketing LP (BRTM), California Community Choice Association (CalCCA), California Municipal Utilities Association (CMUA), California Department of Water Resources (CDWR), California ISO Department of Market Monitoring (DMM), Imperial Irrigation District (IID), Morgan Stanley Capital Group Inc. (MSCG), Pacific Gas & Electric (PG&E), Powerex Corp., Southern California Edison (SCE), Six Cities, Southwestern Power Group (SWPG), Salt River Project (SRP), Silicon Valley Power (SVP), Valley Electric Association (VEA) and Vistra Corporation.

The majority of comments are related to the import transmission scheduling priorities and wheel-through issues. Based on stakeholder feedback received, ISO management decided to start a separate stakeholder process in order to address these issues.

Comments received for the Resource Adequacy Maximum Import Capability allocation process itself can be split into two groups.

First the majority of stakeholders agree that it would be beneficial to have additional transparency during the allocation and trading process and especially to the ownership and usage (after the allocation process ends). Furthermore there were general requests for education regarding the deliverability process in general and specifically regarding import deliverability and its interaction with deliverability of internal resources.

Second where the received comments diverge among stakeholder classes and also diverge even within the same class of stakeholders. These items include (improvements to trading of MIC allocations, potentially augmenting MIC calculation to account for “liquidity”, potential release of MIC allocations if not used in the month ahead process (assuming RAIM is eliminated), etc.).

3. Straw Proposal: Maximum Import Capability Enhancements

Based on stakeholder feedback, the issues related to import transmission scheduling priorities and wheel-through transactions will move forward under a new and separate stakeholder initiative.

The CAISO intends to move forward immediately with MIC items where the majority of comments are aligned including additional transparency during the allocation and trading process, and particularly regarding ownership and usage (after the allocation process ends) as well as additional education related to deliverability of imports and its interrelation to the deliverability of internal resources.

The CAISO intends to further explore other items that have received divergent comments among stakeholder classes and also divergent comments even within the same class of stakeholders. For these, the CAISO currently does not have a specific proposal. The intent is to allow stakeholders to rally their efforts behind certain improvement suggestions that can later have enough stakeholder support in order to become concrete proposals.

3.1. Improve transparency

Enhance ownership transparency of Import Capability allocations and their usage as well as the provisions for reassignment, trading, or other forms of sales of Import Capability among LSEs:

The CAISO will move forward with changes that facilitate transparency regarding ownership of MIC allocations and their use as well as increase in LSE access to the trading of import capability.

The current process is transparent in each of the 13 steps of the MIC allocation process. The, step by step data, including final allocation and bilateral trading are published here:

<http://www.caiso.com/planning/Pages/ReliabilityRequirements/Default.aspx>

New Tariff language, proposed under the MIC stabilization and multi-year allocation initiative, will provide additional transparency by publishing relevant contractual data for resource contracts used to lock MIC at the branch group level on a multi-year bases.

Transparency can be improved the most during annual and monthly trading process and the actual usage after the showings are submitted and validated.

Improving the trading and usage aspect of the process may be necessary to better facilitate the transfer of Import Capability among LSEs and improve the efficient utilization of Import Capability.

3.2. Education regarding deliverability of imports and internal resources

A better understanding of overall deliverability determination can facilitate future improvements:

Stakeholders suggest that providing additional insight into the deliverability process and the interaction between internal resources and imports will support future improvements to the MIC process.

The CAISO will provide details regarding its deliverability methodology through this stakeholder process.

Deliverability is an essential element of any resource adequacy assessment. LSE compliance with resource adequacy procurement obligations will be affected by the ability of their procured supplies to serve load under peak conditions. Therefore, an effective deliverability study is essential in resource planning so that LSEs are able to ‘count’ their resources to determine if they are satisfying the required Reserve Margins. The deliverability of generation (internal and external) to the aggregate of load measures the capability of the transmission system to deliver power output from a particular generator (or import) to load in the CAISO control area during peak demand conditions. Any resource (internal or external) whose output is not fully deliverable will have the capacity that it may offer for resource adequacy purposes reduced. Internal generation capacity and imports are often behind the same transmission constraint therefore increasing import flows would require the internal generation output to be curtailed to maintain system reliability and compliance with mandatory reliability standards.

Consequently, CAISO has developed a deliverability study² to assess deliverability of generation to serve load in the CAISO control area. This deliverability assessment of generation (internal and external) to the aggregate of load is performed through both annual assessments to measure general system changes and for new generating facilities through the Generator Interconnection Deliverability Allocation Procedures³.

² <http://www.caiso.com/Documents/On-PeakDeliverabilityAssessmentMethodology.pdf>

³ <http://www.caiso.com/Documents/AppendixDD-GeneratorInterconnectionDeliverabilityAllocationProcedures-asof-Sep9-2020.pdf>

Deliverability assessments conducted by the CAISO:

- Generation Interconnection Deliverability Allocation Procedures (GIDAP)
 - Phase I
 - Phase II
 - Operational deliverability assessment including annual NQC study
- Transmission Planning Process (TPP)
 - Policy study
- Distributed Generation Deliverability (DGD)

The GIDAP and DG Deliverability studies focus on internal generation. During these studies the deliverability of imports, as available per latest MIC calculation, is preserved. If it is found that there is insufficient transmission to support both the internal generation deliverability and the deliverability for imports then either new transmission upgrades are proposed, new internal generators will not receive their requested deliverability status, imports will be reduced, or NQC cuts are imposed.

The TPP deliverability assessment tests the deliverability of portfolio resources identified as FCDS. The deliverability of imports could be expanded if the current MIC is not sufficient to support out-of-state renewable resources in the portfolio. If it is found that the transmission is insufficient to support the base portfolio deliverability for both internal and external resources then policy-driven upgrades could be identified.

Deliverability assessments methodology study assumptions:

- Highest system need (HSN) scenario (peak sale) HE18 ~ HE22 in the summer

Load	1-in-5 peak sale forecast by CEC
Non-Intermittent Generators	Pmax set to QC
Intermittent Generators	Pmax set to 20% exceedance level during the selected hours (high net sale and high likelihood of resource shortage)
Import	MIC data with expansion approved in TPP.

The net schedules obtained from the MIC calculation plus approved expansion is enforced in the deliverability assessment by branch groups and since these are schedules, the actual flows (per Ohms law) on the branch groups won't match perfectly however the total import on all branch groups matches the preserved deliverability very well.

Unused ETC/TOR for each branch group is represented as a generator at the tie point. Under normal conditions this generator "un-used ETC/TOR" does not inject power, however during contingency conditions the deliverability software turns it on if it is located within the 5% effectiveness region, exactly the same way it turns on all the other CAISO internal resources (not already previously on-line in the initial base case).

- Secondary system need (SSN) scenario (peak consumption) HE15 ~ HE17 in the summer

Load	1-in-5 peak sales forecast by CEC adjusted by the ratio of highest consumption to highest sale
Non-Intermittent Generators	Pmax set to QC
Intermittent Generators	Pmax set to 50% exceedance level during the selected hours (high gross load and likely of resource shortage), but no lower than the average QC ELCC factor during the summer months
Import	Import schedules for the selected hours

Currently known transmission impacts for deliverability of both internal resources and imports:

Deliverable capacity for both internal resources and imports are often behind the same transmission constraint. Increasing either import flows or internal generation output will require a curtailment from the other in order to maintain system reliability and compliance with mandatory reliability standards

Transmission Constraint	Branch Group	Generator Zone inside CAISO
Desert Area Constraint: Lugo - Victorville, Lugo - Eldorado, Lugo - Mohave 500kV line overloads	NOB_BG SYLMAR-AC_MSL Lugo-Victorville_BG ELDORADO_MSL LAUGHLIN_BG MCCULLGH_MSL MEAD_MSL PARKER_BG PALOVRDE_MSL	VEA & GLW Mountain Pass Big Creek and Ventura
Desert Area Constraint: Valley - Alberhill - Serrano 500kV and West of Devers 230kV line overloads	PALOVRDE_MSL BLYTHE_BG IID-SCE_BG	Riverside East Palm Springs
Delevan 500KV Area constraint	COI_BG CASCADE_BG	North of Greater Bay Area PGE generation
Delevan 500KV Area constraint, Rio Oso and Davis Area Constraints	SUMMIT_BG	North of Greater Bay Area PGE generation
East of Miguel	PALOVRDE_MSL IID-SDGE_BG NGILABK4_BG	Imperial Arizona Baja Riverside East
Encina-San Luis Rey	CFE_BG PALOVRDE_MSL IID-SDGE_BG NGILABK4_BG	San Diego Arizona Baja
Imperial Valley transformer	IID-SDGE_BG	Imperial

San Luis Rey-San Onofre	CFE_BG PALOVRDE_MSL IID-SDGE_BG NGILABK4_BG	San Diego Arizona
San Diego Internal	CFE_BG IID-SDGE_BG	San Diego
Silvergate-Bay Boulevard	CFE_BG IID-SDGE_BG	San Diego Baja

Deliverability retention:

Deliverability is only maintained for internal resources and imports commensurate with their capability to serve aggregate of peak load. The deliverability retention is limited in duration.

Internal resources (3 years +):

A generating unit must operate or be capable of operating at the capacity level associated with its rated deliverability to retain its deliverability rights. To the extent a generating unit becomes incapable of operating at this level for any consecutive three-year period, the generating unit will lose its deliverability priority in an amount reflecting the loss of generating capability. The holder of the deliverability priority may retain its rights after the expiration of the three-year period if it can demonstrate that it is actively engaged in the construction of replacement generation to be connected at the bus associated with the deliverability priority. Under such circumstances, the generating unit developer and ISO will identify specific milestones to preserve the deliverability priority. The holder of the deliverability priority will retain only such rights that are commensurate with the size in megawatts of the replacement generation, not to exceed the amount associated with the prior generating unit’s deliverability priority.

Import deliverability (up to 5 years):

The current methodology for calculating MIC at the branch group level uses two years, with the highest import scheduled data, among the last five.

3.3. Other issues that require further exploration

Change in methodology for calculating MIC:

No specific stakeholder suggestion has been received that improves the calculation by, for example, the consideration of “liquidity” at certain branch groups (hubs) or considering the magnitude of RA showings. In order to move forward, a relative agreement should be reached on how “liquidity” is measured at each intertie and how it may be superior compared to the current use of “actual energy schedules”. Otherwise, a methodology may be proposed to look at actual RA showings for each branch group vs. the MIC allocations available on that same branch group and how would that be superior compared to the current use of “actual energy schedules”.

Conduct deliverability studies at the end of the RA showings process:

Stakeholder opinions are divergent on this issue even within the same stakeholder group.

Based on CAISO's experience, it tends to agree with certain stakeholders comments that, due to the length of studies required for RA validation and the financial challenges presented, including leaving LSEs with stranded assets and having high ramifications on CPM back-stop costs allocations regarding system RA, this change will not result in an overall improvement of the RA process.

Incorporate an auction or other market based mechanism into the assignment process:

Stakeholders' opinions are divergent regarding the incorporation of an auction or other market based mechanism into the Available Import Capacity Assignment process.

The auction could provide alternatives or additional opportunities for LSEs to procure import capability greater than their pro rata load ratio share of MIC on any given branch group/intertie to support a particular RA contract in possibly more efficient and transparent manner. However its challenges are high and include the diminishing availability of year-ahead Available Import Capacity that needs to be allocated to the LSEs (after each LSE may exercise its right to lock multi-year Remaining Import Capacity at the branch group level), significant start-up and maintenance costs as well as allocations of auction revenues.

Recapture and then release the unused MIC allocations:

Most stakeholders agree that unused MIC allocations should be released to other LSEs that want to use them. However, there is no stakeholder agreement of when and how the unused MIC allocations are released and how another LSE may receive and use them.

Challenges, to be solved, arise from the fact that MIC is a traded commodity and a right that, once allocated, deserves just compensation. Furthermore, the implementation can only happen after the elimination of RAAIM and will require a new, longer than T-45, timeline for at least the RA import showings (if not all RA showings), else the released MIC allocations will be of no use to any other LSE.

Other stakeholder proposed changes and improvements:

Please provide other suggestions related to the calculation of MIC or its allocation and tracking through the RA process.

4. Stakeholder Engagement and EIM Governing Body Role

Stakeholder input is critical in both identifying potential shortcoming in the current calculation of maximum import capability, its allocation and tracking as well as improvements to the process. The schedule proposed below allows opportunity for stakeholder involvement and feedback.

This initiative will not require a briefing to EIM Governing Body. The real-time priority of RA imports and wheel-through schedules has been moved into a new and separate ISO stakeholder process. The changes to the MIC calculation methodology requires changes to the Reliability Requirements Business Process Manual (RRBPM) whereas changes to the allocation process will need to be approved by the CAISO Board of Governors before changes to the CAISO Tariff need to be approved by the Federal Energy Regulatory Commission (FERC).

4.1. Schedule

Table 3 lists the proposed schedule for the updates to the Maximum Import Capability enhancements process.

Table 3: Schedule for Maximum Import Capability enhancements process

Item	Date
Post Issue Paper	March 11, 2021
Stakeholder Call	March 18, 2021
Stakeholder Comments Due	April 1, 2021
Post Straw Proposal	May 6, 2021
Stakeholder Meeting	May 13, 2021
Stakeholder Comments Due	May 27, 2021
<i>Post Revised Straw Proposal (tentative)</i>	<i>June 24, 2021</i>
<i>Stakeholder Meeting (tentative)</i>	<i>July 1, 2021</i>
<i>Stakeholder Comments Due (tentative)</i>	<i>July 15, 2021</i>
Post Draft Final Proposal	September 1, 2021
Stakeholder Call	September 8, 2021
Stakeholder Comments Due	September 22, 2021
CAISO Board of Governors Meeting	November, 2021

The CAISO proposes to present its proposal to the CAISO Board of Governors on November 2021. The CAISO is committed to providing many opportunities for stakeholder input into its market design, policy development, and implementation activities. Stakeholders should submit written comments to RegionalTransmission@caiso.com.

4.2. Next Steps

The CAISO will discuss the Straw Proposal during the stakeholder call on May 13, 2021. The CAISO requests stakeholders submit written comments in response to the Maximum Import Capability enhancement process straw proposal and stakeholder call by May 27, 2021.