



## **Submit comment on Final Proposal and Draft Tariff Language (export, load, and wheeling priorities)**

Initiative: Market enhancements for summer 2021 readiness

### **1. For the final proposal, please provide your organization's comments on the export, load and wheeling priorities proposal:**

CalCCA supports CAISO's final proposal for export, load and wheeling priorities as a reasonable, implementable near-term solution to address deficiencies in the current process. CalCCA reiterates its previous comments that the CAISO must initiate a process to develop a long-term policy that properly accounts for CAISO's responsibility to ensure reliable service to firm native loads, while providing open access to transmission that is in excess of that needed to serve native load. The process should consider the extent to which the users of CAISO's transmission have and will be responsible for paying for the embedded costs of CAISO's transmission, how the CAISO models the use of the transmission in its Transmission Planning Process and in its deliverability assessments, and any potential interactions between CAISO's Day-Ahead Market, Real-Time Market and Energy Imbalance Market on the use of, and compensation for, CAISO's transmission. The assessment also should consider the extent to which CAISO loads and non-CAISO stakeholders are able to access transmission from adjacent Balancing Authority Areas (BAAs) and from the CAISO on comparable terms and conditions.

CalCCA is hopeful that the CAISO's recently initiated MIC Enhancements initiative will result in a more robust longer-term solution prior to summer 2022 that: i. properly accounts for significant differences in the market structures and access to transmission in the adjacent BBAs compared to the CAISO organized market; ii. recognizes that load serving entities within the CAISO have paid, and will continue to pay, for nearly the entire \$4.3 billion annual CAISO PTO transmission revenue requirement<sup>1</sup>, while wheel-through transactions currently need only make a 15-minute to 1-hour commitment to pay for CAISO's transmission for each scheduled wheeling transaction; iii. recognizes that CAISO's loads have relied on imports and the internal CAISO transmission they have funded for decades to meet their load serving obligations; and iv. accounts for internal transmission constraints and the need to deliver RA resources within the state through those internal transmission constraints at the same time the CAISO is ensuring that wheel-through transactions are deliverable.

### **2. For the final proposal, please provide your organization's position on the EIM Governing Body classification for the export, load and wheeling priorities proposal:**

CalCCA supports classifying this element of the summer 2021 readiness within the EIM Governing Body's advisory role because it would change generally applicable rules of the real-time market, and because the primary driver for this change is not an issue specific to EIM BAAs. The proposed rules will affect participation in EIM by changing the rules governing use of CAISO's transmission.

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<sup>1</sup> [http://www.aiso.com/Documents/HighVoltageAccessChargeRatesEffectiveJan01\\_2021Revised03112021.pdf](http://www.aiso.com/Documents/HighVoltageAccessChargeRatesEffectiveJan01_2021Revised03112021.pdf)

**3. For the final proposal, please provide your organization's comments on the market incentive for imports proposal:**

CalCCA has previously provided supportive comments on this element and has not changed its position.

**4. For the final proposal, please provide your organization's comments on the real-time scarcity pricing enhancements proposal:**

CalCCA has no comments to offer on this topic at this time.

**5. For the draft tariff language, please include redlined comments in the word version of the tariff language posted on the initiative webpage and attach below.**

CalCCA has no comments to offer on this topic at this time.

**6. Please provide additional comments on the final proposal and/or draft tariff language:**

CalCCA has no comment on the draft tariff language at this time.