

April 14, 2020

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA,  
BANNING, COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA  
ON PROPOSED REVISION REQUEST 1239**

The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the “Six Cities”) observe that, contrary to the suggestion by the CAISO in its explanation of the changes proposed in this PRR, the Maximum Import Capability (“MIC”) Stabilization and Multi-Year Allocation initiative has not concluded, and the CAISO has not yet issued a Draft Final Proposal. Stakeholders, including the Six Cities, have advocated for modifications to the CAISO’s existing methodology for establishing MIC that would, if adopted by the CAISO, obviate the need to determine the MIC through a historical methodology, including the methodology proposed in this PRR. While the Six Cities do not oppose implementation of the changes in this PRR on an interim basis pending the completion of the MIC Stabilization initiative, the Six Cities request the CAISO to confirm that further changes to its Business Practice Manuals to reflect the final outcome of the MIC Stabilization initiative will be adopted when the initiative is complete.

Submitted by,

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