

**COMMENTS OF IDAHO POWER COMPANY
ON CAISO'S DRAFT POLICY INITIATIVES CATALOG**

| Submitted By | Company | Date Submitted |
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Idaho Power Company (“Idaho Power”) appreciates the opportunity to comment on the California Independent System Operator’s (“CAISO”) Draft Policy Initiatives Catalog, dated February 28, 2019. Idaho Power appreciates CAISO’s and stakeholders’ work in developing the catalog and has a request for an addition to it, as described below.

Idaho Power believes the Real-Time Imbalance Energy Offset (“RTIEO”) account (charge code 64770) and specifically the Transfer Out calculation may result in a misallocation of RTIEO between the EIM Entities. As a result, some EIM Entities may not be made whole. Unaccounted for Energy (“UFE”) is used in the calculation of the Transfer Out percentage and can vary from entity to entity based on the loss rate per the entity’s Open Access Transmission Tariff as compared to the loss rate used to settle UFE. As a result, some EIM Entities may be transferring significantly more of the initial RTIEO out, while, in contrast, others may be receiving significantly more of the initial RTIEO based on the amount of UFE affecting the Transfer Out percentage calculation. CAISO should evaluate the RTIEO calculation and policy to ensure that entities are being made whole and that no entity is receiving a disproportionate benefit or burden. Idaho Power recommends this issue be added to the current CAISO policy catalog for review in 2019.

Idaho Power thanks CAISO for the opportunity to comment and looks forward to continued collaboration on this and other issues.