



Submitted by	Company	Date Submitted
Christine Kirsten christine.kirsten@pacificorp.com 916-207-4693	PacifiCorp	September 10, 2018

**PacifiCorp’s Comments on the ISO’s Final Policy Initiatives
Catalog Published August 29, 2018**

PacifiCorp appreciates the opportunity to comment on the final 2019 Policy Initiatives Catalog published by the California Independent System Operator (“ISO”) August 29, 2018, (“Catalog”). As stated in previous comments on the draft Catalog, PacifiCorp notes that the Catalog is inconsistent in identifying categorization of the initiatives in Sections 5 and 6, specifically with respect to preliminary energy imbalance market (“EIM”) governing body classification, even though an EIM component exists. PacifiCorp requests that the ISO provide preliminary EIM classification on all Catalog items that affect the EIM.

PacifiCorp provides comments on specific initiatives in the Catalog as follows.

6.1.5 BAA Islanding of Internal Regions (D)

The ISO states that this initiative will consider if a single balancing authority area could island specific regions and continue to operate the market optimization dispatch for each region separately. In its previous comments, PacifiCorp requested further details and information regarding the problems or issues this initiative is intended to solve, however, the ISO did not respond. PacifiCorp again requests further information on this initiative, including an EIM governing body classification. It is unclear from the description with no EIM classification whether or not this initiative impacts the EIM.

6.1.6 EIM Base Schedule Deadline (D)

PacifiCorp restates its request for additional information and explanation regarding why the ISO has changed its position on whether or not a policy stakeholder process is required to implement changes to the EIM base schedule deadline. PacifiCorp notes that at one time, the ISO stated that it could make changes to the base schedule deadline without a full policy stakeholder process. However, it appears the ISO has withdrawn its statement that a policy initiative stakeholder process is not needed for the deadline change. PacifiCorp believes that moving the base schedule deadline closer to the Western Electricity Coordinating Council’s (“WECC’s”) e-tag deadline of T-20



would be beneficial to all EIM participants. In addition, PacifiCorp believes the preliminary EIM classification for this initiative should be E1 (EIM GB Primary), because it involves changes to market rules specifically in the EIM.

6.1.19 Extend Day-Ahead Markets to EIM Entities (D, E2)

PacifiCorp disagrees with the ISO's preliminary EIM classification of this initiative as E2 (EIM GB Advisory). The sole purpose of the initiative is to extend the day-ahead market to EIM entities, which indicates that the driver for the initiative is the EIM, and should be subject to EIM governing body approval using its primary authority. PacifiCorp requests that the preliminary EIM classification be changed to E1 (EIM GB Primary) or at least E3 (EIM GB Hybrid Primary).

Conclusion

PacifiCorp appreciates the ISO's consideration of these comments and looks forward to working with the ISO and stakeholders on the 2019 Policy Initiatives Roadmap.