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**PacifiCorp’s Comments on the CAISO’s Draft Policy Initiatives  
Catalog Published February 28, 2019**

PacifiCorp appreciates the opportunity to comment on the draft 2020 Policy Initiatives Catalog published by the California Independent System Operator (“CAISO”) February 28, 2019, (“Catalog”).

**Initiative Categorization**

The CAISO plans to incorporate new rules that will likely be adopted in March 2019, that modify the EIM Governing Body’s decisional authority, in the next version of the Catalog that will be published in August. PacifiCorp requests that if such rules are adopted in early 2019, they be reflected in the final version of the current draft 2020 Catalog instead of waiting until the August publishing of the Catalog. PacifiCorp provides comments on specific initiatives in the Catalog as follows.

**Transfer Out Adjustment Amount in Real-Time Imbalance Energy Offset Calculations**

PacifiCorp has submitted, along with these comments, a new initiative submission form to address the transfer out adjustment amount in charge code 64770 for real-time imbalance energy offset (“RTIEO”) enhancements needed to better take into account revenue neutrality in the initial RTIEO. As a result of the current charge code methodology and calculations, PacifiCorp specifically had to transfer out \$27.6 million of revenues its BAA needed to be made whole. This issue has a significant impact on PacifiCorp’s EIM benefits and impacts other EIM entities as well. PacifiCorp believes this initiative is extremely important and requests that the CAISO initiate a stakeholder process as soon as possible.

**5.10 Extend Day-Ahead Markets to EIM Entities**

PacifiCorp understands that the E2 EIM Governing Body (“GB”) classification for this initiative, which includes sub-initiatives under sections 5.10.1-5.10.5, is preliminary and subject to change during the stakeholder processes. Because the extended day-ahead market initiatives (“EDAM”) would not exist but for the EIM, it seems that the EIM Governing Body should have more than an advisory role on the related EDAM policies and market design. PacifiCorp looks forward to



working with the CAISO and stakeholders on the process to determine governance of the EDAM initiatives.

#### **6.1.8 BAA Islanding of Internal Regions (D)**

The CAISO 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 on the 2019 final Catalog, PacifiCorp requested further details and information regarding the problems or issues this initiative is intended to solve, however, the CAISO 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.

#### **6.1.9 EIM Base Schedule Deadline (D, E1)**

PacifiCorp restates its request for additional information and explanation regarding why the CAISO 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 CAISO stated that it could make changes to the base schedule deadline without a full policy stakeholder process. However, it appears the CAISO 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.

#### **6.1.21 Bid Floor (N, E2)**

The categorization of this initiative uses "N" for non-discretionary, which is no longer used in the Catalog process. PacifiCorp believes that this initiative's categorization should be changed to "C" for CAISO committed.

#### **6.1.44 Export Charges (D)**

PacifiCorp believes that because this initiative affects the real-time market, it should have an EIM GB classification of E2.

### **Conclusion**

PacifiCorp appreciates the CAISO's consideration of these comments and looks forward to working with the CAISO and stakeholders on the next draft of the Catalog and the 2020 Policy Initiatives Roadmap.