



Submitted by	Company	Date Submitted
Christine Kirsten christine.kirsten@pacificorp.com 916-207-4693	PacifiCorp	October 3, 2018

PacifiCorp’s Comments on the Local Market Power Mitigation Enhancements Issue Paper/Straw Proposal

PacifiCorp hereby submits the following comments to the California Independent System Operator Corporation (“CAISO”) on the Local Market Power Mitigation (“LMPM”) Enhancements issue paper and straw proposal, published September 13, 2018 (“Straw Proposal”). PacifiCorp appreciates the opportunity to provide comments for the CAISO’s consideration.

Local Market Power Mitigation Proposals

In its Straw Proposal, the CAISO proposes enhancements to real-time market power mitigation process mechanics, default energy bid (“DEB”) calculation methodologies for EIM use-limited resources, reference level adjustment processes and gas price indices.

PacifiCorp looks forward to robust stakeholder discussions regarding these proposals at the October 10, 2018, workshop. PacifiCorp’s primary LMPM enhancement focus is on the ability to design a more flexible DEB calculation for EIM use-limited resources. PacifiCorp supports a DEB design model that allows the ability to include opportunity costs in EIM use-limited resource DEB calculations.

EIM Governing Body Classification

The CAISO has determined that each of the enhancement proposals is severable for decisional purposes, and proposes that a separate EIM Governing Body classification should be established for each component of the initiative. PacifiCorp agrees with the CAISO’s plans to present each proposal separately to the EIM Governing Body. PacifiCorp supports the CAISO’s EIM decisional classifications as set forth in the Straw Proposal.

Conclusion

PacifiCorp appreciates the CAISO’s consideration of these comments and looks forward to continuing stakeholder discussions during the October 10, 2018, workshop.