

Stakeholder Comments Template

Metering Rules Enhancements (“MRE”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Metering Rules Enhancements (MRE) stakeholder initiative Draft Final Proposal posted on June 7, 2016 and the Supplement posted on June 16, 2016.

Submit comments to InitiativeComments@caiso.com

Comments are due June 28, 2016 by 5:00pm

Please note: The June 16 Supplement works in conjunction with the June 7 Draft Final Proposal. Together they represent the final MRE proposal that is expected to be presented to the CAISO Board of Governors for approval at the August 31-September 1 meeting.

Both the June 7 Draft Final Proposal and the June 16 Supplement may be found on the MRE initiative webpage at <http://www.caiso.com/informed/Pages/StakeholderProcesses/MeteringRulesEnhancements.aspx>

Please indicate your organization’s overall level of support for the CAISO’s MRE proposal. To indicate level of support, please select one of the following options: (1) Fully support; (2) Support with qualification; or, (3) Oppose. Also, please provide an explanation of your organization’s position. For example, if you choose (1), then please provide reasons for your support. If you choose (2), then please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3), then please explain why you oppose the proposal.

PacifiCorp fully supports the California Independent System Operator's (ISO) Metering Rules Enhancements Stakeholder Initiative Draft Final Proposal and Supplemental Material. PacifiCorp appreciates the ISO's effort to provide more options and flexibility to market participants while still maintaining a high-level of metering accuracy and integrity. PacifiCorp offers the following comments as support to each of the sections within the revised straw proposal.

- 5.1: No required changes to existing metered entities – **Fully Support**
 - PacifiCorp agrees that existing market participants should be grandfathered under their current requirements, as this will not place additional and potentially un-fair costs and burden on current participants.

- 5.2: Allow SCs to submit SQMD for all resources represented Settlement Quality Meter Data Plan – **Fully Support**
 - PacifiCorp feels that the ISO has taken the appropriate steps to allow all market participants the flexibility to utilize the metering facilities and methodology for settlement quality metering data that best meets their business needs, while ensuring that the accuracy and integrity of the market data is not compromised.
 - PacifiCorp agrees that allowing market participants the ability to calculate their default load allocation point (DLAP) from generator and tie-line revenue metering points (top - down) is an acceptable option in addition to utilizing load revenue metering points (bottom - up). This should eliminate potential barriers that some market participants would face from equipment and system upgrades to accommodate a bottom-up approach.
 - PacifiCorp agrees with all metering and SQMD submittal solutions for each entity type listed in section 5.2. PacifiCorp supports the ISO's supplemental changes to the UDC to UDC metering points, and feels that this will give the adjacent UDC's the ability to agree to a common metering/data solution method that aligns with the ISO's tariff. The ISO has ensured a method for dispute resolution, requiring the UDC to UDC point to be an ISOME if agreement cannot be made.

- 5.3: Settlement Quality Meter Data (SQMD) Resource Plan – **Fully Support**
 - PacifiCorp feels that the ISO has taken the appropriate steps to make sure the accuracy and integrity of metering facilities and SQMD is retained, which the SQMD resource plan will aid in achieving.

- 5.4: Modifications to ISOME requirements – **Fully Support**
 - PacifiCorp supports the ISO's recommendation to allow additional communication options that will not facilitate an exemption, which should eliminate some administrative burden on participants.
 - PacifiCorp agrees with the ISO's proposed revisions that will provide consistency with metering interval lengths.