

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Metering Rules Enhancements stakeholder initiative Issue Paper and Straw Proposal posted on February 23 and as supplemented by the presentation and discussion during the stakeholder web conference held on March 3, 2016.

Submit comments to InitiativeComments@caiso.com

Comments are due March 17, 2016 by 5:00pm

The Issue Paper and Straw Proposal posted on February 23 and the presentation discussed during the March 3 stakeholder web conference may be found on the [Metering Rules Enhancements](#) webpage.

Please provide your comments on the straw proposal topics listed below and any other comments you wish to provide in the final section.

PacifiCorp offers the following comments in each section of this document on the California Independent System Operator's (ISO) Metering Rules Enhancements Stakeholder Initiative Issue Paper and Straw Proposal.

[Providing existing metered entities the option to retain current requirements, or to opt for the SCME and SQMD Plan options.](#)

Under this proposal element, existing metered entities can maintain compliance with today's metering infrastructure and requirements without being required to change to the new tariff

requirements unless they elect to do so. Submission of an SQMD Plan would not be required for these existing metering entities.

Comments:

PacifiCorp supports the proposal outlined in section 4.1 of the straw proposal which will allow current SCME's or ISOME's to maintain existing compliance for metering requirements. PacifiCorp agrees with this proposal, which will not impose additional metering requirements and potential costs if they remain as their current ISOME/SCME standing, but will give them the flexibility to change based on proposed rules.

Allowing SCs the option to submit SQMD for all resources

Under this proposal element the ISO is proposing to allow SCs the option to submit SQMD for load, generation, and inertia/intrastate resources. SCs that elect to take advantage of this option will be required to develop and submit a SQMD Plan.

Comments:

PacifiCorp's biggest concern with the proposed metering rules is in relation to Intra-states (UDC to UDC connections) when agreements cannot be made which could result in metering/data integrity issues. During the stakeholder conference call on March 3, 2016 it was mentioned by the ISO that the proposed tariff would put the responsibility on adjacent UDC's to come to an agreement on metering that is used for SQMD submission at Intra-state points. A possible scenario exists where adjacent UDC's decide to utilize their own independent meter/data for SC submission. This scenario could create data integrity issues when metering data does not align between the two metering sources, which would impact UFE calculations.

A recommended solution to this issue would be if the CAISO adopted similar language that NERC uses for interchange metering. Specifically, in NERC's reliability standards (BAL_005 R12) it requires tie-line metering to emanate from a common agreed upon metering source. If similar tariff language existed that required adjacent UDC's to come to an agreement where common metering equipment was used, and each stakeholder was provided access to the common meter/data, then discrepancies and disputes would likely be minimized.

SQMD Plan

To maintain the integrity and quality of meter data used in market settlements, SCs that elect to take advantage of the option to submit SQMD for all resources will be required to develop and submit a SQMD Plan. These plans will provide SCs with the opportunity to demonstrate to the ISO that the meter data submitted to the ISO will be settlement quality. The ISO will provide minimum metering requirements which must be satisfied by the SQMD Plan for compliance. SCs will submit an annual self-audit report as part of the SQMD Plan. The ISO will reserve the right to perform audits and inspections on the implementation and use of each SQMD Plan.

The ISO is requesting comment on its proposed concept of a SQMD Plan requirement. The ISO is also requesting comment on the following items proposed to be a part of the SQMD Plan and whether there are other items that should also be considered:

- Metering facility design
- Procedures used for installation, testing, calibration, maintenance and security
- Program for on-going monitoring and inspection
- Meter data process
- Communication systems and processes
- SC self-assessment procedures

Comments:

PacifiCorp agrees with the proposal to require SC's to submit an SQMD plan for metered resources. PacifiCorp supports the ISO with this element to ensure overall market integrity and accuracy with revenue metered data. PacifiCorp would like further discussion with the ISO and stakeholders on ways to better define and potentially outline requirements for each topic/section that is required in the SQMD plan. PacifiCorp believes that having more definition and guidelines will aid SC's in supplying quality SQMD plan's which will help protect the overall integrity of the revenue metering data for the market.

Metering Exemptions

With advancements in metering technology, revenue meters are now capable of performing complex computations while still maintaining the accuracy and integrity of the data.

These complex schemes currently require exemptions from ISO Tariff section 10.2.1.2 Format for Data Submission.

The ISO receives a number of exemption requests for the requirement to provide “raw and unedited data” due to complex metering schemes.

Comments:

PacifiCorp would like better clarity on what the ISO is proposing for changes to this tariff rule.

Other comments

Please provide any comments not associated with the topics above here.

Comments: