

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 Revised Straw Proposal posted on April 19 and as supplemented by the presentation and discussion during the stakeholder web conference held on April 26, 2016.

Submit comments to InitiativeComments@caiso.com

[Comments are due May 10, 2016 by 5:00pm](#)

The Revised Straw Proposal (and the draft SQMD Plan included as Attachment A) posted on April 19 and the presentation discussed during the April 26 stakeholder web conference may be found on the [Metering Rules Enhancements](#) webpage.

Please provide your comments on the four areas of the revised straw proposal listed below.

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 Revised Straw Proposal.

- (1) Provide existing metered entities the option to retain current requirements and maintain their status quo, or instead to opt for (2) and (3). The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

PacifiCorp supports the proposal outlined in section 5.1 of the Revised Straw Proposal that will allow existing entities to maintain their current status as an ISOME or SCME, but allow them to take advantage of new options being proposed if they desire.

- (2) Allow scheduling coordinators the option to submit settlement quality meter data (SQMD) for scheduling coordinator metered entity (SCME) resources represented. The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

Section 5.2 in the Revised Straw Proposal (page 15) states “Each SC shall at least annually test the metering facilities of the SCME it represents and self-audit the meter data provided to ensure compliance with all LRA requirements.” In section 6.2 of the Settlement Quality Meter Data plan (page 12), the ISO references that SC’s shall annually test the metering facility’s it represents.

PacifiCorp would like clarification on what the ISO means by “Each SC shall at least annually test the metering facilities of the SCME it represents”. Does the ISO intend for metering/communication equipment to be tested annually at each metering facility? Or is the intention to perform annual audits on each metering facility to ensure that testing is being performed per the SCME’s standard maintenance practices? PacifiCorp has concerns about annual testing requirements for all metering facilities, as it would increase operating costs at the risk of not providing significant benefit. PacifiCorp already has a meter testing program in place that is working, where meters are tested on a periodic interval, based on the application it’s measuring.

- (3) Require submittal of a SQMD Plan by scheduling coordinators opting to submit SQMD for SCME resources represented. A draft SQMD Plan was attached to the revised straw proposal. Topics addressed in the draft SQMD Plan include: responsibility, agreements, market participation, quality assurance, audits, and corrective actions. The ISO invites stakeholders to comment on the draft. The ISO is particularly interested in whether the draft SQMD Plan captures all relevant topics.

Section 4.1 in the Settlement Quality Meter Data Plan (page 10) outlines the supported documents needed to delineate market resources, and makes reference to a

requirement for Electrical Schematics to have a stamped approval by a Professional Engineer (PE). PacifiCorp would like clarification from the ISO if the intention is for all submitted Electrical Schematics to have a PE stamp, or only the Schematics that the Authority Having Jurisdiction (AHJ) deems required to have PE stamp.

Section 5.1 in the Settlement Quality Meter Data Plan (page 10) states “In the absence of metering standards set by a Local Regulatory Authority, all related equipment/devices must meet or exceed the standards for CAISO Metered Entities listed within the Metering BPM Attachment A and B.” Does the ISO intend for the SCME to adhere to all meter programming standards set forth in Attachment B within the BPM or just the parameters required for SQMD submission? It is PacifiCorp’s understanding that SCME’s would submit SQMD to the ISO via the OMAR system, and views only some of the specific programming requirements in the BPM as necessary for submission (i.e. load profile channel parameters are required for data submittal, but display modes are not). PacifiCorp recommends that the ISO outline minimum data requirements for SCME’s, and that be included on the template that is submitted with the SQMD plan.

- (4) Modifications to ISO metered entity (ISOME) requirements. Tariff section 10.2.6 requires revenue quality meter data (RQMD) be provided to the ISO directly; however, the ISO may exempt an entity from this requirement if installation of communication links is unnecessary, impracticable or uneconomic. The ISO proposes to allow communication of meter data via any available method provided appropriate security and/or encryption of the data exists and is verified to be in place for the method chosen. The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

PacifiCorp supports the proposal outlined in section 5.1 of the Revised Straw Proposal that will allow more flexibility with meter communications.

Other comments

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

Within Section 5.2 of the Revised Straw Proposal (page 17), the ISO invited stakeholders to express a preference with the 3 options that were proposed in relation to metering for UDC to UDC intratie points, and support their position.

PacifiCorp prefers option 2 proposed by the ISO that states “Make it an explicit tariff requirement that adjacent UDCs must come to agreement on metering used for SQMD submission at UDC-to-UDC intratie points”, as long as it requires SQMD to be sourced from a common, agreed upon, meter.

PacifiCorp’s position on this matter is that option 2 will ensure the highest quality and accuracy of meter data. PacifiCorp’s primary concern is that in the event of data submission by multiple meter sources for adjacent UDC’s, a resulting error between data could impact UFE calculations. Option 2 will place accountability on both UDCs to come to agreement on the meter data submission method, and where applicable, provide access to meter data for both entities.

PacifiCorp is concerned that option 1 could lead to adjacent UDCs coming to an agreement where each entity should set their own metering equipment as well as submitting SQMD for their respective metering sources. PacifiCorp’s concerns are the same as addressed prior, with resulting errors between different data sources and the impacts to the UFE calculations.

PacifiCorp’s is concerned that option 3 does not align with the overall objective of the Metering Rules Enhancement Stakeholder Initiative, which gives entity’s options to choose the most economical method (ISOME or SCME). Placing requirements on UDC to UDC intratie points to be treated as ISOME polled meters could increase costs to participants and provide additional barriers, primarily where existing metering/comm infrastructure is in-place. In addition, SCME’s could lose efficiency’s when required to operate some metering points as a SCME and others as an ISOME.