

**PACIFICORP'S COMMENTS
ON DRAFT FINAL TARIFF
January 31, 2014**

I. INTRODUCTION

Pursuant to the schedule established by the California Independent System Operator Corporation ("CAISO") for its Energy Imbalance Market ("EIM") Stakeholder Process, PacifiCorp submits the following comments to the CAISO on the Draft Final Tariff, dated January 16, 2014 ("Second Draft Tariff"). PacifiCorp continues to be an active participant in the CAISO's Stakeholder Process, including submitting comments on all iterations of the CAISO's straw proposals for EIM design and the CAISO's First Draft Tariff, dated November 12, 2013. PacifiCorp's comments below are designed to be helpful and constructive and they are offered in the spirit of further achieving the development of robust and effective EIM market rules and practices.

As an initial matter, PacifiCorp commends the CAISO and appreciates its effort in being responsive to many of PacifiCorp's comments on the First Draft Tariff. In particular, in its earlier comments, PacifiCorp voiced its concern that Section 29 failed to include a sufficient level of specificity in making cross-references to other sections of the CAISO Tariff, in order to provide EIM Market Participants with greater clarity concerning their rights and obligations under the CAISO Tariff. In this Second Draft Tariff, the CAISO made strides in including appropriate clarifying cross-references to other specific sections of the CAISO Tariff to further define the contours of applicability to the EIM. For example, the proposed revisions to Sections 29.9 (Outages and Critical Contingencies) and 29.11 (Settlements and Billing for EIM Market Participants) that define the applicability of certain CAISO Tariff sections to EIM are an improvement. PacifiCorp requests that the CAISO continue to identify instances wherein such cross-references and explicit limitations on applicability can further aid EIM Market Participants in identifying the universe of their potential obligations. Several comments contained herein address continued instances of problematic cross-referencing.

II. COMMENTS ON SPECIFIC SECTIONS OF THE SECOND DRAFT TARIFF

A. Introduction

PacifiCorp requests that the CAISO provide as much advance notice as possible on the stakeholder conference call referenced in the introduction addressing any further substantive changes to the Draft Final Tariff, which PacifiCorp understands will be posted by Market Notice. PacifiCorp also seeks more information from the CAISO on its planned schedule for the posting, review, and comment of its draft EIM Business Practice Manual(s) ("BPM").

B. Section 29.1(a) Operation of EIM

PacifiCorp suggests the following revisions to Section 29.1(a):

- (a) Operation of EIM. Pursuant to Section 29, the CAISO shall *expand operation and settlement of* the Real-Time Market to provide for the purchase and sale of balancing

~~Energy in any Balancing Authority Area for which the Balancing Authority executes an EIM Entity Agreement with the CAISO, in conjunction with the operation and settlement of the Real-Time Market in the CAISO Balancing Authority Area in accordance with the provisions of the CAISO Tariff.~~

The struck language is overbroad to the extent that it applies generally to the CAISO Tariff. PacifiCorp continues to believe that EIM Market Participants should be able to easily understand the precise sections of the CAISO Tariff that apply to EIM to define the scope of their rights and obligations.

C. Section 29.1(c) Inconsistency Between Provisions

PacifiCorp supports the CAISO retaining the proposed language stating that a provision in Section 29 shall prevail over an inconsistent provision in another section of the CAISO Tariff regarding the rights or obligations of EIM Market Participants. Section 29 is meant to expressly set forth the CAISO's prevailing provisions with regard to EIM Market Participants, will be approved by the Commission, and any provision in the remainder of the CAISO Tariff that may inadvertently conflict should be subordinate.

D. Section 29.1(d) Discontinuation of EIM Entity Participation

PacifiCorp appreciates and supports the proposed changes that the CAISO made to the Second Draft Tariff with regard to the ability of the CAISO to (i) temporarily discontinue the participation of an EIM Entity in the Real-Time Market for a period not to exceed 60 days, and (ii) extend the discontinuation of EIM participation under certain circumstances. PacifiCorp believes that these changes are an improvement and the Company is committed to continue working with the CAISO on these issues regarding temporary or permanent discontinuation of EIM Entity participation.

Notwithstanding the support of these proposed changes, PacifiCorp proposes deletion of the phrase "if the resolution is identified within 60 days after issuance of the Market Notice" in Section 29.1(d)(1). PacifiCorp understands that the intent of the revisions is to provide the CAISO with additional time beyond the initial 60 days after the EIM Entity Implementation Date to resolve a market or system operational issue that was identified during the 60-day period. PacifiCorp agrees that the CAISO should be afforded reasonable additional time commensurate with the required resolution of the identified issue, but believes that removal of the language will promote greater clarity concerning the applicable timing requirements.

PacifiCorp requests that the CAISO consider a change to Section 29.1(d)(4)(i) to the extent that it requires the EIM Entity to continue to submit EIM Base Schedules and associated meter data, to enable continued EIM operation, *until* the CAISO issues a subsequent Market Notice that a cause of a temporary discontinuation has been resolved and the EIM has been reinstated. It is not the case that such activity by the EIM Entity would be suspended or cease when a temporary discontinuation is resolved. Section 29.1(d)(4)(i) should clarify that, upon resolution, EIM operations should return to normal, with an appropriate cross-reference to Section 29.

Section 29.1(d)(5) requires the CAISO to prevent EIM Transfers in the event it issues a Market Notice of the temporary discontinuation of EIM participation by an EIM Entity. PacifiCorp

requests that the CAISO clarify the procedures it will use to “prevent” EIM Transfers or include a reference to the BPM which will describe such procedures.

E. Section 29.4 Roles and Responsibilities

PacifiCorp strongly supports the addition of Section 29.4(b)(5) (EIM Entity Corrective Actions) to permit EIM Entities to take corrective actions subject to the provisions of their respective open access transmission tariffs (“OATT”). This important change recognizes the need to take immediate mitigation actions following a notice of termination to restrict EIM Transfers and suspend real-time market charges with respect to the EIM Entity. While PacifiCorp understands the need for the CAISO to issue a Market Notice associated with a notice of termination, the proposed 10-day period in Section 29.4(b)(4)(C) is too long. The CAISO should be able to issue a Market Notice upon receipt of a notice of termination no later than the day after receipt.

Section 29.4(b)(3)(A) requires the EIM Entity to perform its obligations in accordance with the EIM Entity Agreement, Section 29, and “other provisions of the CAISO Tariff that by their terms apply to EIM Entities.” In order to aid in clarity, PacifiCorp recommends that the CAISO instead use similar language to what it has proposed for Section 29.1(b)(2)(C).

Section 29.4(b)(3)(G) requires the EIM Entity to determine and inform the CAISO which resource types and transmission service providers or holders are “eligible to participate” in the Real-Time Market. PacifiCorp requests that the CAISO revise this language, as only EIM Participating Resources are “eligible to participate” in EIM. As presently drafted, the provision is trying to also include concepts relating to other transmission owners or transmission rights holders which do not necessarily align with concepts relating to eligibility to participate in EIM. PacifiCorp recommends that the CAISO either revise the provision or bifurcate the concepts into separate provisions.

PacifiCorp recommends an additional EIM Entity obligation in Section 29.4(b)(3) to require the EIM Entity to inform the CAISO whether or not the EIM Entity intends to utilize the CAISO forecast consistent with CAISO's EIM design.

The CAISO should include provisions in Section 29.4(d) (concerning EIM Resources) and 29.4(e) (concerning EIM Participating Resource Scheduling Coordinators) requiring the CAISO to inform the EIM Entity when it has authorized (or de-authorized) an EIM Participating Resource or an EIM Participating Resource Scheduling Coordinator to participate in the EIM after meeting all of the CAISO's requirements. PacifiCorp and other EIM Entities will need these notifications so that they can issue the final certification authorization to its participating customers or take action to withdraw the certification and include the resource as a non-participating resource in the EIM Entity Base Schedule. The CAISO and the EIM Entity must coordinate and be in agreement as to the status of each resource to avoid unnecessary imbalance charges.

PacifiCorp proposes striking the words “and that are included in an EIM Resource Plan,” in Section 29.4(c)(4)(F); EIM Resource Plans will not include Interchange adjustments made after T-40, whereas the provision in question references T-20.

In Section 29.4(d)(1)(A), PacifiCorp proposes that the CAISO replace the term “scheduled” with “pseudo-tied.”

F. Section 29.6 Communications

As drafted, the reference in Section 29.6(b) (EIM Communications and OASIS) to Section 6 of the CAISO Tariff is overbroad. In particular, Section 6.3.1 may authorize the CAISO to communicate directly with resources located in PacifiCorp's Balancing Authority Areas (“BAAs”) as required to ensure System Reliability, in situations of deteriorating system conditions. PacifiCorp is concerned this language would permit the CAISO to address a reliability concern in an EIM Entity's BAAs by supplanting the EIM Entity's Manual Dispatch responsibility as the Balancing Authority.

Accordingly, PacifiCorp proposes the following revisions to Section 29.6(b):

(b) EIM Communications and OASIS. Section 6 shall govern communications and information availability regarding the participation of EIM Market Participants in the Real-Time Market except that-

(1) references to internal resources shall be deemed to include EIM Resources; ~~and~~

(2) references in Sections 6.2.2.1 and 6.5.2.1 to the CAISO Controlled Grid and references in Sections 6.5.4.2.2(a) and 6.5.5.1.1 to CAISO Balancing Authority Area shall be deemed references to the EIM Area;

(3) the portion of Section 6.3.1 that authorizes the CAISO to communicate directly with Generators and Demand Response Providers to ensure System Reliability shall not apply to Generators and Demand Response Providers in the EIM Entity's BAA or pseudo-tied from an external BAA to the EIM Entity BAA;

(4) Section 6.5.2.2.2 does not apply to EIM Resources; and

(5) Section 6.5.2.3.3 does not apply to EIM Entities.

Sections 6.5.2.2.2 and 6.5.2.3.3 should not apply to the EIM to the extent they concern the authority to bid in the Day-Ahead Market and ancillary service requirements, respectively.

G. Section 29.7 EIM Operations Under Normal and Emergency Conditions

Section 29.7(c) (Load Curtailment) provides that the CAISO will not issue Dispatch Instructions to an EIM Entity Scheduling Coordinator with respect to Load or Demand that has not been bid into the Real-Time Market. Assuming a Load or Demand has elected to participate in EIM (as those terms are defined by the CAISO Tariff), PacifiCorp assumes that such participants would have their own Scheduling Coordinators. Thus, the reference to Dispatch Instructions would seem to be directed to the Scheduling Coordinators of the participating Load or Demand rather than the EIM Entity Scheduling Coordinator.

PacifiCorp understands the opening sentence in Section 29.7(e) (EIM Transfers) to mean that the CAISO will manage EIM Transfers as aggregate Dynamic Schedules with each EIM Entity

BAA. PacifiCorp understands that, as a result of the CAISO's implementation of Order No. 764, there is some question as to whether the CAISO maintains the ability to aggregate transfers in this manner. Accordingly, the CAISO should clarify or confirm. One typographical note: the CAISO should remove the "the" before "EIM Transfers" in the first sentence of Section 29.7(e).

Section 29.7(h)(2) only refers to EIM Manual Dispatches to resources; however, it is possible that a Load or Demand could also receive a Manual Dispatch from the EIM Entity and such dispatch would also need to be communicated to the CAISO. The CAISO should revise this section accordingly.

Section 29.7(j)(2)(C) should be revised to provide that, if the CAISO declares an EIM interruption, the CAISO may "instruct one or more EIM Entities to *maintain system balance without EIM dispatch*" or other modification which is consistent with the principle that the EIM Entity always retains dispatch authority over resources within its BAAs.

H. Section 29.9 Outages and Critical Contingencies

Sections 29.9(b)(2), (b)(3), and (c)(2) covering Transmission and Generation Maintenance Outages require notice of outages "in accordance with the deadlines set forth in Section 9." Although improvements to cross-references in this section have been made, PacifiCorp submits that this broad cross-reference still raises questions regarding the specific deadlines expected of EIM Entities due to the multiple notification requirements (*e.g.*, annual, quarterly, 30 days prior to the month, seven days in advance) referenced throughout Section 9 of the CAISO Tariff. PacifiCorp proposes that the EIM Entity should provide information on planned outages seven days in advance, and that Section 29.9 should reflect this requirement.

The CAISO should strike the following language from Section 29.9(b)(1): "including the transmission capacity made available by an EIM Transmission Service Provider to the Real-Time Market." This deletion would be consistent with PacifiCorp's comments below on the use of the appropriateness of the defined term "EIM Transmission Service Provider" in the CAISO Tariff.

I. Section 29.10 Metering and Settlement Data

Section 29.10(d) (Interchange Meter Data) provides that Metering for Settlement purposes is required for all EIM Interties. PacifiCorp understands that interchange interval meter data will not be interfaced from an EIM Entity to the CAISO and that, rather, e-Tags will be used to constitute the actual settlement quality meter data at the EIM Entity interchange points. To the extent this understanding is accurate, PacifiCorp recommends that the CAISO modify Section 29.10(d).

J. Section 29.11 Settlements and Billing for EIM Market Participants

PacifiCorp provides below general comments and numerous comments on specific sub-sections of Section 29.11 concerning settlements.

General Comments: One general note relating to comments that appear in several specific sections below: it would be very helpful if the CAISO clearly delineated which settlement

sections should apply to EIM Participating Resources and non-participating resources, as this would assist EIM Entities in demonstrating the various charges that will be sub-allocated to the appropriate entities. For example, Section 29.11(b) provides that only an EIM Participating Resource will receive/pay the FMM Instructed Imbalance Energy ("IIE") charge. PacifiCorp has understood that a non-participating resource that responds to a Manual Dispatch would also be settled as IIE; as such, the CAISO should clarify whether non-participating resources are included in this and other provisions.

Related to this, PacifiCorp understands that the EIM Entity will be subject to a number of CAISO settlement allocations, including: Daily and Monthly Neutrality Adjustment; Daily and Monthly Rounding Adjustment; CAISO Generator Interconnection Process Forfeited Deposit Allocation; Invoice Deviation (distribution and allocation); Default Invoice Interest Payment; Default Invoice Interest Charge; Invoice Late Payment Penalty; Financial Security Posting (Collateral) Late Payment Penalty; Shortfall Receipt Distribution; Shortfall Reversal; Shortfall Allocation; and Default Loss Allocation. These charges and payments, and any others not currently listed, should be specifically identified in Section 29.11. EIM Entities need a complete set of defined allocations from the CAISO in order to be able to appropriately sub-allocate the charges and payments under their respective OATs.

In addition, PacifiCorp requests that the CAISO consider either supplementing this Section 29.11 or including in its EIM BPM a provision clarifying which of the enumerated charge codes would continue to apply in periods during which the CAISO is preventing EIM Transfers consistent with its Tariff.

29.11(b)(1) (FMM Instructed Imbalance Energy): Operational adjustments are included in Section 11.5.1.2 of the CAISO Tariff, as revised for compliance with Order No. 764, but there is no mention of how payments or charges for RTD IIE are handled for these situations in Section 11.5.1.2. PacifiCorp requests that the CAISO include a reference in the CAISO Tariff similar to the other 11 types of energy mentioned in order to address the manner in which operational adjustments will be handled for payments and charges.

Section 11.5.1.1 refers to "MSS Operators" and "Gross" versus "Net" Settlement Electing provisions. It is unclear to PacifiCorp how these terms relate to an EIM Entity, and whether an EIM Entity may be considered an "MSS Operator."

Section 29.11(b)(1)(B) only allows for settlements of FMM IIE with EIM Participating Resource Scheduling Coordinators. However, non-participating resources will also receive settlements for FMM IIE through the EIM Entity Scheduling Coordinator in the event of FMM Exceptional Dispatch Energy. As such, the CAISO should amend this section.

29.11(b)(2) (RTD Instructed Imbalance Energy): Section 29.11(b)(2)(B) only allows for settlements of RTD IIE with EIM Participating Resource Scheduling Coordinators. However, non-participating resources will also receive settlements for RTD IIE through the EIM Entity Scheduling Coordinator in the event of RTD Exceptional Dispatch Energy or operational adjustments. As such, the CAISO should amend this section.

29.11(b)(3) (Uninstructed Imbalance Energy): Section 29.11(b)(3)(C)(i) requires that the calculation of Uninstructed Imbalance Energy be in accordance with Section 11.5.2.2, except that references to the "Day-Ahead Schedule" shall be deemed references to the EIM Base Schedule. PacifiCorp proposes striking the term "Day-Ahead Schedule" in favor of "Day-Ahead Scheduled CAISO Demand" consistent with Section 11 of the CAISO Tariff.

In addition, it appears that there is presently no provision in this Section 29.11 allowing non-participating resources to receive settlement other than on a five-minute basis. Therefore, any benefits for 15-minute scheduling by variable energy resources are not presently captured. PacifiCorp understands from communications with CAISO that non-participating resources have an ability to avail themselves of some Order No. 764 benefits through 15-minute schedule modifications.

29.11(d) (Charges for Over- and Under-Scheduling of EIM Entities): Section 29(d)(3) provides that the distribution of excess revenues from under- and over-scheduling charges shall be allocated to "Load in the EIM Area that was not subject to" those charges according to metered Demand. PacifiCorp proposes that the CAISO revise this language to indicate whether the excess revenues will be allocated only within the EIM Area that incurred the charge or whether such revenues will be allocated to all EIM Areas that did not exceed the threshold. To the extent it is the latter, the CAISO should revise the language accordingly.

29.11(e)(2) (Real-Time Congestion Offset): It is unclear to PacifiCorp what the "sharing" of EIM Internal Interties means in cross-referenced Section 11.5.4.1.1(a)(1)(ii) (also being revised as part of the Second Draft Tariff). PacifiCorp queries whether this means that the congestion costs related to dynamic transfers between two EIM BAAs will be shared by the two EIM BAAs and in what manner. PacifiCorp requests that the CAISO provide additional information on this issue prior to the release of the BPM for the EIM.

29.11(f) (Real-Time Bid Cost Recovery): Section 29.11(f)(2) suggests that EIM Participating Resources will not be eligible for recovery of Start-up and Minimum Load Costs in the Real-Time Bid Cost Recovery mechanism. PacifiCorp requests that the CAISO clarify whether this is correct or whether this is language based on previous market design proposals excluding the EIM from unit commitment.

Settlement Dispute Timing: PacifiCorp also requests that the CAISO extend the timeframe under which EIM Entities may raise a settlement dispute with the CAISO. As proposed, Section 29.11 states that the CAISO shall assess such charges, address disputed invoices, and make any financial adjustments in accordance with the settlements process and schedule set forth in Section 11 of the CAISO Tariff. Under Section 11.29.8.4.3, the CAISO will issue a settlement statement on T+55B based on actual polled and reported meter data. Based on the current timelines in the CAISO Tariff, the EIM Entity would then have only 22 business days, until T+77B, to raise disputes. This 22-day window affords insufficient time for the EIM Entity to: (1) process the settlement statement; (2) sub-allocate to customers, in accordance with the monthly billing cycle; (3) provide a period for customer review; and (4) raise with the CAISO any disputes identified by customers.

PacifiCorp's transmission customers should have the ability to dispute whether or not a CAISO charge was properly allocated to the EIM Entity. While the PacifiCorp EIM Entity can itself raise a dispute, it must not be solely responsible for this review, especially as important data may be in the possession of a transmission customer with a non-participating resource. As a result, PacifiCorp suggests that an EIM Entity should have until T+110B to raise a dispute under Section 29.11. The additional 33 business days would provide time for the EIM Entity to review and process the sub-allocations and then provide the information to customers in advance of invoicing. It would also allow time after invoices are issued for a customer to identify a dispute, and for the EIM Entity and the customer to determine if the dispute involves the original allocation from the CAISO to the EIM Entity.

K. Section 29.27 CAISO Markets and Processes

Section 29.27 provides, "[t]he provisions of Section 27 that are applicable to the Real-Time Market shall apply to EIM Market Participants." Section 27.1.2.1 is applicable to the Real-Time Market but, as it concerns Ancillary Services, is therefore not applicable to the EIM. There are similar concerns with references to Sections 27.1.2.3 and 27.1.3. In addition, Section 27.2 on the CAISO creation of Load Aggregation Points does not apply to the EIM. The CAISO should consider including appropriate exceptions to this section.

L. Section 29.32 Greenhouse Gas Regulation and EIM Bid Adders

In several instances, the CAISO replaces references to "California" with references to the "CAISO [BAA]." PacifiCorp seeks clarification from the CAISO as to the specific implications of this change.

M. Section 29.34 EIM Operations

The reference in Section 29.34(f)(1) to non-participating resources having a requirement to submit real-time hourly EIM Base Schedules to the CAISO should be revised to reflect that such non-participating resources may have an obligation to provide EIM Base Schedules to the EIM Entity consistent with an EIM Entity's OATT. The language as currently drafted suggests that the CAISO may have a direct relationship with non-participating resources.

PacifiCorp requests that the CAISO add language to Section 29.34(k) (Supply Insufficiency) clarifying that the sufficiency analysis will occur at T-40.

With regard to Section 29.34(e), governing responsibility for submission of EIM Resource Plans, and Section 29.34, governing EIM Base Schedules, PacifiCorp's understanding of EIM implementation is the EIM Entity Scheduling Coordinator is responsible for submitting the EIM Resource Plan for the entirety of PacifiCorp's BAAs, including EIM Participating Resources, non-participating resources, and loads. The EIM Resource Plan is the combination of the EIM Base Schedules for Demand, Generation, and Interchange and the submission of these components to the Market Operator is facilitated by an interface hosted by the CAISO (EIM SIBR). The referenced sections make several statements indicating that EIM Participating Resource Scheduling Coordinators are responsible for separately and directly submitting their EIM Resource Plans to the Market Operator, which is in conflict with PacifiCorp's understanding. PacifiCorp understands that EIM Participating Resource Scheduling Coordinators

are responsible for submitting only the bid portion of the Resource Plan separately and directly to the CAISO. PacifiCorp requests that the CAISO revise Sections 29.34(e) and (f) accordingly.

PacifiCorp requests that the CAISO add the following sentence to Section 29.34(m)(3): "The sufficiency determination will not be performed for an EIM Entity that has zero import and export transmission rights available for use by the EIM." Section 29.34(m)(5)(1) (Effect of Insufficiency) provides circumstances under which the CAISO will hold the EIM Transfer limit into the EIM Entity BAA at the value for the last 15-minute interval. The CAISO should clarify that this evaluation occurs every 15 minutes.

N. New EIM Defined Terms

The CAISO introduces the defined terms "EIM Resource" and "EIM Participating Resource." While PacifiCorp believes that it understands the distinction between the two terms (the former as the physical resource and the latter as the entity), the usage of the terms throughout Section 29 appears to treat these terms as interchangeable, which may promote confusion as a result of the plain meaning of the terms. PacifiCorp suggests that the CAISO maintain the term "EIM Participating Resource" to refer to the resource and use a different nomenclature to reflect the owner, operator, or seller.

The definition of "EIM Base Schedule" clearly maintains the schedules for resources at an hourly level. PacifiCorp seeks confirmation or clarification from the CAISO that the resource component of an EIM Base Schedule will always be hourly even for variable energy resources in light of the CAISO's Order No. 764 implementation.

PacifiCorp maintains concerns about the use of the defined term "EIM Transmission Service Provider" in the CAISO Tariff. PacifiCorp understands that this term evolved from stakeholder discussions. However, PacifiCorp believes that arrangements between itself, as an EIM Entity, and any other entities within its BAA that own and/or control transmission is a matter to be addressed by the EIM Entity through its tariff and joint coordination with such transmission owners. PacifiCorp agrees with the current language in Section 29.17(a), in which the EIM Entity is responsible for registering all transmission capacity available for use in the EIM; however, PacifiCorp does not feel that additional provisions addressing how the EIM Entity and any other transmission owners will interact or make arrangements are appropriate for the CAISO Tariff. For any single transmission ownership scenario, there may be multiple unique circumstances requiring tailored solutions and which are more appropriately addressed by the EIM Entity. In any event, the term "EIM Transmission Service Provider" is confusing and suggests that all owners of transmission within EIM Entities are also FERC-jurisdictional transmission service providers, a term with its own distinct legal and regulatory meanings and obligations, which is not always the case. In order to avoid this type of confusion, PacifiCorp has elected to use the term "PacifiCorp BAA Transmission Owner" in its draft OATT posted January 16, 2014.

Consistent with this comment, PacifiCorp requests that the language in Section 29.4(b)(3)(B) be removed, as such language suggests there is a direct relationship between the CAISO and EIM Transmission Service Providers. Likewise, language in Section 29.26(b) (Non-CAISO

Facilities) should remove all references to "EIM Transmission Service Provider," as the CAISO Tariff should not dictate how transmission arrangements internal to an EIM Entity are made.

Section 29 appears to toggle between the use of "EIM" and "Energy Imbalance Market." For consistency, PacifiCorp recommends that the CAISO adopt the use of "EIM" where applicable as the defined term in all instances.

O. EIM Entity Agreement

PacifiCorp requests that the CAISO consider whether the EIM Entity Agreement should cover the ability of the EIM Entity to take corrective actions as contemplated in Section 29.4(b)(5). The EIM Entity Agreement currently does not appear to address an EIM Entity's ability to invoke contingency corrective actions, even in the event of termination. Because the CAISO has included mitigation measures in the CAISO Tariff, these measures need to be reflected in the EIM Entity Agreement.

P. Suggested Global Revision

Section 29 makes numerous time requirements. To the extent that the CAISO Tariff does not already do so, the CAISO should clarify that all such time requirements are based on Pacific Standard Time, to reflect that EIM Entities may have resources located in other time zones, including, for example, Mountain Standard Time.

III. CONCLUSION

PacifiCorp appreciates the ongoing efforts of the CAISO management and staff to consider and develop changes to the CAISO Tariff in a timely manner and in accordance with the market design principles set forth during this Stakeholder Process. PacifiCorp will continue to be an active participant in the EIM Stakeholder Process and undertake the necessary activities to be able to support startup of the EIM on October 1, 2014.