



**PACIFICORP'S COMMENTS ON THE  
2017 POLICY INITIATIVES ROADMAP  
January 9, 2017**

**I. INTRODUCTION**

PacifiCorp hereby submits the following comments to the California Independent System Operator Corporation ("ISO") on the draft final 2017 Policy Initiatives Roadmap ("Roadmap") that was published December 15, 2016. PacifiCorp appreciates the opportunity to provide comments on this initiative for the ISO's consideration.

**II. COMMENTS**

The ISO has published its draft final Roadmap which sets forth the ISO's ranking of discretionary initiatives and proposes which initiatives are scheduled for the ISO's stakeholder process in 2017. PacifiCorp appreciates the complexity of the ISO's ranking process and agrees that the criteria used are appropriate. However, PacifiCorp reiterates its previous comment that adjustments to the methodology for determining the "desired by stakeholders" category are needed with respect to initiatives that are within the primary authority of the energy imbalance market ("EIM") Governing Body. Because the number of EIM stakeholders is small relative to the total number of ISO stakeholders, this category will seldom if ever get a score over three for EIM initiatives. PacifiCorp requests that the ISO consider weighing stakeholder desire for EIM initiatives by measuring the number of stakeholders who desire high priority against only the total number of stakeholders affected by the EIM, instead of all ISO stakeholders. PacifiCorp's comments on specific items in the Roadmap are as follows.

**A. Real-Time Market Enhancements**

PacifiCorp continues to support the ISO's ranking of Section 6.3.1 Real-Time Market Enhancements as the number one discretionary initiative on the Roadmap. PacifiCorp understands that this initiative would include enhancements to the real-time market timeline to shorten the time required for the real-time market optimization system to run, thereby shortening the time required to submit bids and EIM base schedules, including e-Tags, to closer to the Western Electricity Coordinating Council's 20 minutes prior to the operating hour ("T-20") deadline for submitting e-Tags. Doing so would resolve many stakeholder issues related to their ability to align the bilateral market more closely with the ISO's real-time market. In addition, enhancements of the ISO's real-time market will be beneficial to the EIM, its participants, and non-participating customers in EIM areas.

## **B. Management of EIM Imbalance Settlement for Bilateral Schedule Changes**

The ISO proposes Section 6.4.7 Management of EIM Imbalance Settlement for Bilateral Schedule Changes as the number two discretionary initiative on the Roadmap. This initiative would explore whether the ISO's current wheeling through functionality could be used to manage bilateral schedule changes (after T-57 until T-20) that source, sink, or wheel across the EIM footprint. PacifiCorp is interested in supporting stakeholder initiatives that help to resolve potential seams issues between the EIM and bilateral trading and, as such, supports exploring this initiative. However, PacifiCorp would further note, as it has in previous comments, that it would require significantly more information in order to determine if the proposal will result in unjustified cost shifts between PacifiCorp's transmission customers affected by EIM settlements.

## **C. Donation by Third Party for Transmission Capacity Available for EIM Transfers**

The Roadmap lists Section 6.4.5 Donation by Third Party for Transmission Capacity Available for EIM Transfers as the number five discretionary initiative, which positions the initiative to be considered for a stakeholder process in 2018. PacifiCorp reiterates its support for this initiative, and sees it as a priority for the ISO, particularly as the EIM footprint continues to expand in the west resulting in a footprint that is partially contiguous and for which the most limiting constraint in actual operations is often related to transfer capability across the EIM footprint. This initiative would provide an incentive for transmission owners or customers to make otherwise unused transmission available which would potentially improve the overall operations and efficiency of the EIM.

## **III. CONCLUSION**

PacifiCorp appreciates the ISO's consideration of these comments.