



Comments of PacifiCorp on the EIM Greenhouse Gas Enhancement

Submitted by	Company	Date Submitted
Christine Kirsten Christine.kirsten@pacificorp.com 916-207-4693	PacifiCorp	May 29, 2018

Introduction

PacifiCorp hereby submits the following comments to the California Independent System Operator Corporation (“ISO”) on its Extended Short-Term Unit Commitment (“STUC”) issue paper and straw proposal (“Proposal”) dated May 15, 2018, and discussed during a May 22, 2018, stakeholder meeting.

Proposed Implementation Schedule

PacifiCorp recognizes that the ISO is expecting challenges in the upcoming summer and winter months, pursuant to the results of its 2018 Summer Loads and Resources Assessment. However, PacifiCorp believes that the proposed implementation in fall of 2018 is ambitious and may be problematic for PacifiCorp and other EIM Entities. PacifiCorp urges the ISO to consider the time and resources required by the EIM Entities to implement the proposed EIM base schedule requirements, and requests that the ISO’s implementation be extended to at least spring of 2019.

The ISO proposes to extend the STUC horizon from 4.5 hours to 18 hours, which would require the EIM Entities to submit base schedules for 20 hours. While it is true that EIM Entities *can* currently submit base schedules 7 days in advance of the operating hour, and most EIM Entities’ tariffs require that base schedules be submitted 7 days in advance, PacifiCorp’s tariff does not contain a provision requiring the submission of base schedules 7 days in advance. In order for PacifiCorp to provide as accurate as possible generation and interchange forecast data for the longer STUC horizon, PacifiCorp may need to make a revision to its open access transmission tariff (“OATT”). If PacifiCorp determines it is necessary to make OATT revisions to implement the change to the timing of base schedule submission, it will need to file with the Federal Energy Regulatory Commission (“FERC”), which would require at least two to three months prior to implementation to complete the FERC filing process.

In addition, PacifiCorp believes that the STUC process changes being proposed are largely for the ISO’s benefit, as PacifiCorp is not aware of any benefit the changes would provide for the PacifiCorp EIM Entity. Further, PacifiCorp notes that the proposed implementation timeline



puts an unnecessary burden on its vendors, without any resulting benefit for PacifiCorp, which will also disrupt higher priority vendor projects already in the implementation queue.

Energy Transfer System Resource (“ETSR”) Capacity in the Expanded STUC Process

PacifiCorp is concerned with the ISO’s usage of ETSR capacity in the expanded STUC look-ahead. EIM Entities voluntarily commit ETSR capacity to support real-time market activity based on either the Interchange Rights Holder mechanism or ATC methodology. ETSR capacity made available to the market using either of these methods could significantly change from the 20-hour look-ahead to 75 minutes prior to the operating hour (“T-75”), due to schedule changes in the bilateral market, or by the holder of those interchange rights opting to change its election of transmission capacity to the market. PacifiCorp believes that this dynamic could result in large inaccuracy of ETSR capacity assumptions made during the STUC process, and create harmful impacts on the market and EIM areas.

As a mitigation measure, PacifiCorp suggests that the ISO consider making assumptions about ETSR capacity for a set number of hours in the STUC horizon. For example, the ISO could assume that incremental ETSR capacity is set at zero megawatts for the STUC horizon, which could reduce the impact of potentially inaccurate unit commitment on each EIM Entity balancing authority area (“BAA”). Additionally, PacifiCorp requests that the ISO hold a technical workshop with EIM Entities to explore aspects of how data accuracy, or inaccuracy, in an extended STUC horizon will impact unit commitment decisions, and other impacts on EIM BAAs.

Energy Imbalance Market Governing Body Classification

PacifiCorp agrees with the ISO’s classification of this initiative as hybrid, non-EIM specific, because the Proposal contains market rule changes that are EIM specific (requirements for EIM base schedules), as well as changes that are generally applicable to the real-time market, and these changes are not severable for decisional purposes. PacifiCorp understands that the changes to the requirements for EIM base schedules must be approved by the EIM Governing Body before it goes to the ISO Board of Governors for approval, and the rest of the initiative would fall under the EIM Governing Body’s advisory role.

Conclusion

PacifiCorp appreciates the opportunity to submit these comments for the ISO’s consideration and looks forward to the ISO’s responses.