

# Stakeholder Comments Template

## Metering Rules Enhancements (“MRE”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Metering Rules Enhancements (MRE) stakeholder initiative Draft Final Proposal Second Supplement posted on September 1, 2016.

Submit comments to [InitiativeComments@caiso.com](mailto:InitiativeComments@caiso.com)

**Comments are due September 19, 2016 by 5:00pm**

Please note: The September 1 second supplement works in conjunction with the June 7 draft final proposal and the June 16 supplement. Together all three papers represent the ISO’s MRE proposal.

All documents for the MRE initiative are available on the initiative webpage at <http://www.caiso.com/informed/Pages/StakeholderProcesses/MeteringRulesEnhancements.aspx>

Please indicate your organization’s overall level of support for the CAISO’s MRE proposal. To indicate level of support, please select one of the following options: (1) Fully support; (2) Support with qualification; or, (3) Oppose. Also, please provide an explanation of your organization’s position. For example, if you choose (1), then please provide reasons for your support. If you choose (2), then please describe your qualifications or specific modifications that would allow you to fully support the proposal. If you choose (3), then please explain why you oppose the proposal.

PacifiCorp supports with qualifications (2) for the ISO's MRE proposal. PacifiCorp would like better clarification with the Second Supplement to the Draft Final Proposal that the ISO issued on September 1, 2016. The following comments/questions address PacifiCorp's current qualifications:

- 1) PacifiCorp would like clarification on which entity types (meter points) will require 5 minute SQMD submission. In the Metering Rules Enhancement proposal, section 5.2 listed a table that broke out the submission type for each metering point. It would be beneficial if the ISO would identify which of those metering points will require 5 minute SQMD directly from the meter, and what the acceptable data requirements/intervals are for metering points that can be calculated as a part of the 4th proposed new method. This would help participants understand which metering points may require upgrades.
- 2) PacifiCorp currently has contractual agreements with joint owners of power plants, where energy is settled on an hourly basis. To fulfill this obligation an allocator method is employed within the Energy Management System that calculates hourly values derived from multiple metering points. These hourly values are then sent over ICCP to each joint-owner. Will PacifiCorp be required to change its allocator calculations to produce 5 minute SQMD for ISO submission requirements?