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**PacifiCorp’s Comments on the Reliability Coordinator Services
Rate Design, Terms, and Conditions Draft Final Proposal**

PacifiCorp hereby submits the following comments to the California Independent System Operator Corporation (“ISO”) on the Reliability Coordinator Services Rate Design, Terms, and Conditions draft final proposal published June 20, 2018, (“RC Services DFP”). PacifiCorp appreciates the opportunity to provide comments for the ISO’s consideration.

Introduction

PacifiCorp supports the changes from the ISO’s straw proposal as proposed in the RC Services DFP. PacifiCorp appreciates the transparency provided by the ISO thus far and encourages the ISO to maintain that level of transparency throughout the stakeholder processes and implementation.

Allocation of FTEs

In the RC Services DFP, the ISO increased its proposed full-time employee (“FTE”) requirements to 55 FTEs to support the RC Services function. PacifiCorp desires a better understanding of how those 55 FTEs will be allocated to the operations, technology, human resources, and other categories under the ISO’s RC Services function. PacifiCorp is particularly interested in the allocation of FTEs to operations to support the reliability of the system.

Implementation Timeline

The ISO has proposed September 1, 2019, as the date on which the ISO would be the RC of record for RC customers outside of the ISO’s balancing authority area. In order to allow all entities outside of the ISO’s balancing authority area more time to complete all of the necessary steps of onboarding, PacifiCorp recommends moving that go-live date to November 1, 2019.

Conclusion

PacifiCorp appreciates the ISO’s consideration of these comments.