

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

PacifiCorp

)

Docket No. ER25-951-000

**COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (CAISO)¹ submits these comments supporting the proposed revisions to PacifiCorp's Open Access Transmission Tariff (OATT) submitted in this proceeding on January 16, 2025 (PacifiCorp Revised OATT Filing).²

I. Summary

The PacifiCorp Revised OATT Filing will enable PacifiCorp's participation in the CAISO's Extended Day-Ahead Market (EDAM), in alignment with the CAISO's Commission approved EDAM Tariff.³ PacifiCorp's proposed OATT

¹ Capitalized terms not otherwise defined herein have the meanings set forth in Appendix A to the CAISO Tariff. The CAISO previously filed a doc-less motion to intervene in this proceeding on January 21, 2025.

² The CAISO files these comments pursuant to Rule 211 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.211. PacifiCorp previously submitted proposed revisions to the PacifiCorp OATT to accomplish the same purpose in Docket No. ER25-573-000 (PacifiCorp Original OATT Filing). On January 16, 2025, PacifiCorp submitted a motion to withdraw the PacifiCorp Original OATT Filing and terminate that docket as being superseded by the above-captioned proceeding. No party filed to oppose the motion to withdraw within 15 days, meaning the withdrawal automatically became effective as of close of business on January 31. See 18 C.F.R. § 35.17(a). Differences between the PacifiCorp Original OATT Filing and the PacifiCorp Revised OATT Filing are discussed below in section III of these comments.

³ See *Cal. Indep. Sys. Operator Corp.*, 185 FERC ¶ 61,210 (2023) (DAME [Day-Ahead Market Enhancements]-EDAM Order); *Cal. Indep. Sys. Operator Corp.*, Commission letter order, Docket No. ER23-2686-001 (Apr. 30, 2024) (DAME-EDAM Compliance Order); *Cal. Indep. Sys. Operator Corp.*, 187 FERC ¶ 61,154 (2024) (EDAM Access Charge Order).

revisions are the culmination of a lengthy stakeholder effort that included coordination with the CAISO to develop the mechanisms and related OATT provisions required for PacifiCorp's participation in EDAM.

EDAM builds upon the Western Energy Imbalance Market (WEIM), which has operated successfully for over a decade, generated nearly \$7 billion in cumulative benefits, and will continue to serve balancing areas participating in EDAM or remaining in the WEIM. Just as PacifiCorp amended its OATT prior to participation in the WEIM, it now proposes incremental OATT revisions to maintain participation in the real-time market and to participate in the day-ahead market. This incremental approach has worked well and allows a balancing area to remain in the WEIM and join EDAM when it decides such participation would be beneficial. The same spirit of collective collaboration that has made the WEIM a success story applies to the implementation and future evolution of EDAM. The CAISO remains committed to continually enhancing the market design where warranted for the benefit of all market participants and stakeholders, and transparently addressing concerns that may arise.

The CAISO's primary objective throughout the PacifiCorp stakeholder process and its subsequent discussions with PacifiCorp was to ensure the proposed OATT revisions aligned with the Commission-approved CAISO Tariff. For the reasons explained below, the CAISO supports PacifiCorp's OATT revisions as aligned with the requirements of the CAISO Tariff and urges the Commission to accept them as requested by PacifiCorp. The Commission has recognized the EDAM design is consistent with or superior to the Commission's

pro forma OATT. Similarly, the Commission should find PacifiCorp's OATT revisions are consistent with or superior to the *pro forma* OATT.

II. Background

A. Amendments to the CAISO Tariff to Implement EDAM

On August 22, 2023, the CAISO filed an amendment to the CAISO Tariff to implement the Day-Ahead Market Enhancements (DAME) and EDAM designs (August 2023 Filing).⁴ The CAISO explained that, working together, the DAME and EDAM designs will support the optimal day-ahead commitment of a geographically diverse set of resources across an expanded market area, maximizing the use of available transmission capability and providing broad reliability, economic, and environmental benefits. Participants in the existing WEIM⁵ can choose voluntarily to join EDAM and settle all balancing area loads and resources in the day-ahead timeframe in addition to all imbalances between day-ahead positions and the real-time market.

On December 20, 2023, the Commission accepted almost all of the August 2023 Filing, including the bulk of the CAISO Tariff revisions to implement the EDAM design. The Commission found "the EDAM framework builds upon the existing CAISO day-ahead and WEIM framework to provide substantial economic benefits for customers from resource diversity and savings from replacing existing manual processes with CAISO's automated process."⁶ As the

⁴ The CAISO submitted the August 2023 Filing in Docket No. ER23-2686-000.

⁵ The WEIM is sometimes also called the Energy Imbalance Market or EIM.

⁶ DAME-EDAM Order at P 12.

Commission recognized, “EDAM is not a new market; rather, it takes advantage of CAISO’s existing day-ahead market by adding new procedures to accommodate the voluntary participation of other BAAs [balancing authority areas].”⁷ Furthermore, the Commission noted “EDAM will allow each balancing authority that voluntarily joins to transfer supply, Imbalance Reserves, and Reliability Capacity based upon the economic optimization of resources across a broad geographic area.”⁸

The Commission found that, “[a]s demonstrated in CAISO’s filing and as discussed in this order...DAME and EDAM have the potential to yield significant benefits to the voluntary WEIM and EDAM participants.”⁹ Moreover, the Commission found “CAISO has demonstrated that its proposal presents a just and reasonable regional solution to expand the benefits of day-ahead market participation to existing WEIM participants and new entrants to both WEIM and EDAM,” and “EDAM has the potential to optimize the use of existing transmission and resources across a larger footprint in the West, which will provide economic and reliability benefits to participants.”¹⁰ The Commission went on to state, “by leveraging a larger and more diverse set of resources across the Western Interconnection, we expect that DAME and EDAM will help CAISO and other EDAM participants to manage the impacts of increasing variable energy

⁷ DAME-EDAM Order at P 12.

⁸ DAME-EDAM Order at P 12.

⁹ DAME-EDAM Order at P 42.

¹⁰ DAME-EDAM Order at P 42.

resources and extreme weather events in the region.”¹¹

The only revisions to the CAISO Tariff the Commission did not initially accept in the DAME-EDAM Order were those regarding the proposed EDAM access charge, which the Commission rejected without prejudice, allowing CAISO to submit additional support for its access charge proposal.¹² The CAISO submitted an amendment to the CAISO Tariff with additional support for the EDAM access charge on April 12, 2024.¹³ The Commission accepted that CAISO Tariff amendment in the EDAM Access Charge Order issued on June 11, 2024.¹⁴ This completed all necessary CAISO Tariff elements to initially develop and implement EDAM.¹⁵

The CAISO’s EDAM Tariff provisions regarding onboarding and implementation activities have already gone into effect, pursuant to the DAME-EDAM Order, the DAME-EDAM Compliance Order, and the EDAM Access Charge Order.¹⁶ These provisions support the activities of interested participants, and the CAISO, working together, to implement EDAM. The CAISO

¹¹ DAME-EDAM Order at P 42.

¹² DAME-EDAM Order at PP 460-65. The Commission also directed the CAISO submit a compliance filing that included certain corrections and clarifications. *See id.* at Ordering Paragraph (D). The CAISO submitted the compliance filing on February 16, 2024, and the Commission accepted it in the DAME-EDAM Compliance Order issued on April 30, 2024.

¹³ The CAISO filed that CAISO Tariff amendment in Docket No. ER24-1746-000.

¹⁴ *Cal. Indep. Sys. Operator Corp.*, 187 FERC ¶ 61,154.

¹⁵ The CAISO subsequently filed an enhancement to the original EDAM design that extends support for inter-scheduling coordinator trades of energy within participating balancing areas, which the Commission accepted on December 23, 2024, effective as of the actual go-live date for EDAM. *See Cal. Indep. Sys. Operator Corp.*, 189 FERC ¶ 61,224 (2024).

¹⁶ *See* DAME-EDAM Order at Ordering Paragraph (A); DAME-EDAM Compliance Order at Appendix; EDAM Access Charge Order at Ordering Paragraph (A).

currently expects DAME and EDAM will go live on May 1, 2026, and it will inform the Commission of the actual go-live date within five business days after it occurs.¹⁷

B. The PacifiCorp Revised OATT Filing

In December 2022, PacifiCorp announced its intention to join EDAM, and it entered into an EDAM Entity Implementation Agreement with the CAISO on April 25, 2024.¹⁸ The EDAM Entity Implementation Agreement contemplates that PacifiCorp, which is currently a participant in the WEIM, will develop changes to the PacifiCorp OATT as required to support EDAM participation.¹⁹ PacifiCorp submitted its Revised OATT Filing to fulfill this expectation. The PacifiCorp Revised OATT Filing constitutes the first set of revisions submitted by an entity to its OATT to allow its participation in EDAM.²⁰ PacifiCorp accurately states:

The CAISO EDAM tariff contains the framework of how non-CAISO Balancing Authority Areas (“BAA”), like PacifiCorp, may participate in the day-ahead market. However, the CAISO EDAM tariff leaves implementing transmission providers with certain decisions about how to implement EDAM participation under their respective OATTs. The enclosed OATT revisions thus facilitate PacifiCorp’s participation in the EDAM.²¹

PacifiCorp explains the WEIM has delivered \$891 million in savings to

¹⁷ See DAME-EDAM Order at Ordering Paragraphs (B)-(C); DAME-EDAM Compliance Order at Appendix; EDAM Access Charge Order at Ordering Paragraphs (B)-(C).

¹⁸ The EDAM Entity Implementation Agreement between PacifiCorp and the CAISO is available on the Western Energy Market webpage at: <https://www.westerneim.com/Documents/apr-25-2024-edam-entity-implementation-agreement-pacifiCorp.pdf>.

¹⁹ PacifiCorp EDAM Entity Implementation Agreement, Recital C.

²⁰ See also the discussion in footnote 2 above regarding the history of the PacifiCorp Original OATT Filing.

²¹ Transmittal letter for PacifiCorp Revised OATT Filing at 2.

PacifiCorp customers.²² In addition, “an EDAM participation benefit analysis conducted in 2024 indicates that PacifiCorp’s customers are expected to benefit from \$359 million in annual savings, as well as an estimated nine terawatt-hours of reduced renewable energy curtailment across the study footprint, among other benefits.”²³

PacifiCorp requests the Commission issue an order by May 16, 2025 accepting the OATT revisions, without modification or condition.²⁴ PacifiCorp proposes to make revised Attachment T-1 to the OATT (entitled EDAM Preparation Activities) effective May 16, 2025, and to implement the balance of the OATT revisions on PacifiCorp’s EDAM go-live date, with PacifiCorp informing the Commission of the actual go-live date within five business days after it occurs.²⁵

III. Comments

The CAISO supports the PacifiCorp Revised OATT Filing to allow PacifiCorp’s participation in EDAM as an EDAM entity and as an EDAM transmission service provider. The Commission has recognized EDAM’s potential to yield significant benefits for the voluntary WEIM and EDAM participants. These will include benefits for PacifiCorp’s customers, as the economic studies cited by PacifiCorp indicate. Commission acceptance of the

²² Transmittal letter for PacifiCorp Revised OATT Filing at 3.

²³ Transmittal letter for PacifiCorp Revised OATT Filing at 3.

²⁴ Transmittal letter for PacifiCorp Revised OATT Filing at 1, 38.

²⁵ Transmittal letter for PacifiCorp Revised OATT Filing at 37-38.

OATT revisions is necessary to allow PacifiCorp to participate in EDAM and thereby allow realization of these benefits.

Furthermore, the CAISO agrees with PacifiCorp that its OATT revisions are consistent with or superior to the Commission's *pro forma* OATT.²⁶ As PacifiCorp correctly states,²⁷ the Commission found revisions to its OATT to allow PacifiCorp's participation in the WEIM are just and reasonable and consistent with or superior to the *pro forma* OATT.²⁸ The Commission similarly found other OATT amendments to facilitate participation in the WEIM are consistent with or superior to the *pro forma* OATT.²⁹ Likewise, the Commission found that the EDAM transmission framework it accepted in the DAME-EDAM Order is consistent with or superior to the *pro forma* OATT.³⁰ As the Commission recognized, EDAM builds on the WEIM and is an extension of the CAISO's well-established day-ahead market. The Commission should similarly accept PacifiCorp's Revised OATT Filing as consistent with or superior to the *pro forma*

²⁶ See, e.g., transmittal letter for PacifiCorp Revised OATT Filing at 1 ("These proposed changes to the OATT are necessary for PacifiCorp to participate in the EDAM as an EDAM Entity and are consistent with or superior to the *pro forma* OATT, as demonstrated herein."); *id.* at 17 ("PacifiCorp's OATT changes to implement EDAM are just and reasonable, not unduly discriminatory, and otherwise consistent with or superior to the *pro forma* OATT.") (some capitalization changed to lower-case type).

²⁷ "[L]ike its EIM changes already in place, the Commission should find the enclosed changes 'consistent with or superior' to the *pro forma* OATT." Transmittal letter for PacifiCorp Revised OATT Filing at 17.

²⁸ See *PacifiCorp*, 147 FERC ¶ 61,227, *order on reh'g, clarification, & compliance*, 149 FERC ¶ 61,057 (2014), *order on reh'g*, 150 FERC ¶ 61,084, *order accepting compliance filings*, 151 FERC ¶ 61,261 (2015).

²⁹ See, e.g., *Nev. Power Co.*, 151 FERC ¶ 61,131, at P 85, *order on reh'g & clarification*, 153 FERC ¶ 61,306, at PP 30-31 (2015); *W. Area Power Admin.*, 174 FERC ¶ 61,097, at PP 25-27 (2021); *W. Area Power Admin.*, 182 FERC ¶ 61,206, at P 22 (2023).

³⁰ DAME-EDAM Order at P 307.

OATT. PacifiCorp's filing represents the next step in this evolution and expansion of the West-wide markets and will allow PacifiCorp and its customers to realize significant benefits.³¹

The CAISO participated extensively in the PacifiCorp stakeholder process that resulted in the PacifiCorp OATT revisions. The CAISO's engagement in the PacifiCorp stakeholder process reaffirms its support for the continued evolution of EDAM following implementation.³² This commitment extends to all interested EDAM participants and stakeholders with the understanding that EDAM, as established by the CAISO Tariff and as proposed by PacifiCorp's OATT revisions, represent a starting point. EDAM will necessarily evolve over time as the CAISO, participants, and stakeholders gain experience with the initial design and consider how to enhance the design to further the overarching objective of developing and establishing a well-functioning market consistent with sound design principles for the benefit of all customers. To this end, the CAISO will continue to engage with all stakeholders to evolve the market design in the same spirit of collective collaboration it has demonstrated to date.

The CAISO has compared the final version of PacifiCorp's OATT revisions with the relevant provisions in the CAISO Tariff—specifically, with various CAISO Tariff provisions that require an EDAM entity and EDAM transmission service provider to include provisions addressing specified matters in their tariff(s). The

³¹ See *supra* section II of this Answer (discussing benefits of voluntary participation in those markets as identified in the DAME-EDAM Order and PacifiCorp's analysis).

³² See, e.g., *id.* at 20 (discussing CAISO support for PacifiCorp's preparation of an informational report explaining the perceived performance of the congestion offset charge code allocation in the PacifiCorp balancing authority areas and congestion issues impacting OATT customers more generally).

PacifiCorp OATT revisions fulfill the applicable requirements for EDAM participation specified in the CAISO Tariff. Attachment A to these comments contains a table that maps the relevant CAISO Tariff provisions to provisions in the revised PacifiCorp OATT that satisfy the CAISO Tariff requirements, which illustrates alignment with the CAISO Tariff requirements for EDAM participation.

As PacifiCorp correctly explains, its Revised OATT Filing

is substantially identical to the [PacifiCorp Original OATT Filing] with the exceptions of a change in the way PacifiCorp plans to address day-ahead congestion charges and a clarification about the allocation of certain “transfer” revenues. These changes are the result of certain developments after the [submittal of the PacifiCorp Original OATT Filing], including good faith outreach to PacifiCorp by certain stakeholders, and improved visibility into solutions that are technically feasible resulting from continued integration discussions with the CAISO.³³

The CAISO worked with PacifiCorp to explore options to address the stakeholder feedback that led PacifiCorp to propose the changes it describes. Based on the continued integration discussions PacifiCorp references, the CAISO determined the two-step methodology PacifiCorp now proposes for allocating collected congestion revenue, and the associated clarification about the allocation of certain transfer revenues, align with the CAISO Tariff requirements for EDAM participation and are implementable by the CAISO in a timely manner as part of the EDAM design.³⁴ If any future participant in EDAM proposes to include a

³³ Transmittal letter for PacifiCorp Revised OATT Filing at 1-2 (internal citation omitted). These differences from the PacifiCorp Original OATT Filing are described in more detail at pages at 18-20 and 31 of PacifiCorp’s transmittal letter and in the Prepared Direct Testimony of Kristopher Bremer on behalf of PacifiCorp (Exhibit No. PAC-001) at pages 9-15 (Bremer Testimony).

³⁴ In the PacifiCorp Original OATT Filing, PacifiCorp had proposed to allocate returns of collected congestion revenue on a measured demand basis. See transmittal letter for PacifiCorp

comparable allocation methodology in its OATT, the CAISO expects similarly such methodology will align with the CAISO Tariff requirements and be implementable by the CAISO.

IV. Correspondence

In accordance with Rule 203(b)(3) to the Commission's Rules of Practice and Procedure,³⁵ the CAISO respectfully requests that all correspondence and other communications regarding this filing be directed to the following:

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V. Conclusion

For the foregoing reasons, the CAISO requests the Commission accept the PacifiCorp Revised OATT Filing, without modification or condition, in an order

Revised OATT Filing at 19; Bremer Testimony at 14-15. Based on its review of the PacifiCorp Original OATT Filing, the CAISO determined that proposed methodology would also have been consistent with the CAISO Tariff requirements and implementable by the CAISO. However, that proposal has been superseded by the proposal contained in the PacifiCorp Revised OATT Filing and thus is beyond the scope of this proceeding.

³⁵ 18 C.F.R. § 385.203(b)(3).

issued by May 16, 2025.

Respectfully submitted,

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ATTACHMENT A

Comparison of Relevant CAISO Tariff Provisions with PacifiCorp OATT Provisions

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p><u>From CAISO Tariff Section 11.5.4.1.5 (entitled EIM Transfer Revenue):</u></p> <p>(b) Allocation. The CAISO will allocate EIM Transfer revenue by dividing the revenue equally to the Balancing Authorities on each side of the EDAM Internal Intertie as defined by the Balancing Authority Area boundary at that intertie, except when the CAISO has been notified during the implementation of the Real-Time Market within an EIM Entity Balancing Authority Area of an agreement between both EIM Entities on either side of a EIM Transfer that a different allocation for some portion of the transfer revenue is required to give effect to a pre-existing commercial arrangement, which will then be sub-allocated—</p> <p style="text-align: center;">. . . .</p> <p><i>(2) for an EIM Entity Balancing Authority Area that does not participate in the Day-Ahead Market in accordance with the associated EIM Transmission Service Provider tariff,</i></p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 11.5.8 (entitled Real-Time Market Transfer Revenue):</u></p> <p>[Tables listing sub-allocation methodologies for RUC Reliability Capacity Transfer Revenue Settlement (Charge Code 8811) and RTM Transfer Revenue Settlement (Charge Code 8470)]</p>

³⁶ For ease of reference, the CAISO Tariff provisions quoted in this table that mention other tariffs—*i.e.*, identify a need for an EDAM rule to be included in a tariff other than the CAISO Tariff—are shown in *italicized* text. Other provisions of the PacifiCorp OATT that may reference the CAISO Tariff for any reason are not included in this table. The sole purpose of this table is to illustrate that the revised PacifiCorp OATT satisfies the specific CAISO Tariff provisions that require some provision for EDAM participation to be included in another tariff.

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p>and (3) for an EIM Entity Balancing Authority Area that participates in the Day-Ahead Market depending on whether the transmission across an EIM Intertie is made available by: <i>(a) an EDAM Entity pursuant to Section 33.18.2.2.1 or Section 33.18.2.2.3, in which case the CAISO will allocate the EIM Transfer revenue to the EIM Entity Scheduling Coordinator for further allocation by the EIM Transmission Service Provider in accordance with its tariff, (b) an EDAM Transmission Service Provider customer pursuant to Section 33.18.2.2, in which case the CAISO will allocate the EIM Transfer revenue directly to the Scheduling Coordinator for the EDAM Transmission Service Provider customer, or (c) an EDAM Legacy Contact or EDAM Transmission Ownership Right pursuant to Section 33.18.2.2.2, in which case the CAISO will allocate the EDAM Transfer revenue to the Scheduling Coordinator for the EDAM Legacy Contact or EDAM Transmission Ownership Right holder, respectively.</i></p>	
<p><u>From CAISO Tariff Section 33.4.2 (entitled EDAM Transmission Service Provider):</u></p> <p>An EDAM Transmission Service Provider must:</p> <p style="text-align: center;">. . . .</p> <p><i>(b) have provisions in effect in the EDAM Transmission Service Provider's tariff, as necessary or applicable, to enable operation of the Day-Ahead Market, including an obligation for customers of the EDAM Transmission Service</i></p>	<p><u>From revised PacifiCorp OATT Section 16.1 (entitled Conditions Required of Transmission Customers):</u></p> <p>Point-To-Point Transmission Service shall be provided by the Transmission Provider only if the following conditions are satisfied by the Transmission Customer:</p> <p style="text-align: center;">. . . .</p> <p>g. The Transmission Customer has executed necessary Scheduling Coordinator agreements under the MO Tariff</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<i>Provider to have a Scheduling Coordinator for purposes of interfacing with the CAISO.</i>	and other requirements of Transmission Customers under the MO Tariff
<p data-bbox="201 407 995 480"><u>From CAISO Tariff Section 33.9.1 (entitled Maintenance Outages):</u></p> <p data-bbox="201 518 1045 805">An EDAM Entity, EDAM Transmission Service Provider, or transmission operator within the Balancing Authority Area shall remain responsible for performing engineering studies and approving Maintenance Outages <i>under the applicable EDAM Transmission Service Provider tariff or the Reliability Standards, as applicable</i>, within its EDAM Entity Balancing Authority Area on both transmission facilities and EDAM Resources.</p>	<p data-bbox="1083 407 1885 518">See a number of provisions in the PacifiCorp OATT, e.g., Section 19.3 (entitled System Impact Study Procedures) and Section 19.4 (entitled Facilities Study Procedures)</p> <p data-bbox="1083 555 1843 628"><u>From revised PacifiCorp OATT, Attachment T, Section 13.1.1 (entitled Planned Transmission Outages):</u></p> <p data-bbox="1083 665 1906 881">The PacifiCorp EDAM Entity shall submit information regarding planned transmission outages to the MO's outage management system in accordance with MO Tariff Sections 33.9 and 29.9 of the MO Tariff. The PacifiCorp EDAM Entity shall update the submittal if there are changes to the transmission outage plan.</p> <p data-bbox="1083 919 1843 1029"><u>From revised PacifiCorp OATT, Attachment T, Section 13.3.1 (entitled Planned EDAM Resource Facility Outages and Known Derates):</u></p> <p data-bbox="1083 1066 1885 1429">EDAM Resource Scheduling Coordinators shall submit information regarding planned resource outages and known derates to the PacifiCorp EDAM Entity. Planned outages and known derates shall be reported to the PacifiCorp EDAM Entity seven (7) or more days in advance and preferably at least thirty (30) days in advance of the outage or known derate. The PacifiCorp EDAM Entity Scheduling Coordinator shall then submit this outage information to the MO's outage management system in accordance with Section 13.1 of Attachment T</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
	and MO Tariff Sections 29.9(c) and 33.9.1, as applicable. PacifiCorp EDAM Resource Scheduling Coordinators shall update the submittal if there are changes to the resource outage plan.
<p><u>From CAISO Tariff Section 33.11.1.1.1 (entitled Energy Transfer Revenue):</u></p> <p>An EDAM Entity will ensure EDAM Transfer revenue for Energy allocated to its EDAM Entity Scheduling Coordinator is thereafter allocated by all applicable EDAM Transmission Service Providers <i>as may be detailed in the EDAM Transmission Service Provider tariff</i> and business practices.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 10.3.1 (entitled Day-Ahead Energy Transfer Revenue):</u></p> <p>The MO [Market Operator—<i>i.e.</i>, the CAISO] will directly settle the allocation of certain EDAM Transfer Revenues directly with the Scheduling Coordinator for the applicable Transmission Customer owed such allocation under the terms of the MO Tariff. Amounts settled between the MO and the EDAM Entity will be sub-allocated to Transmission Customers as follows:</p> <p>[Tables listing sub-allocation methodologies for Day-Ahead Imbalance Reserve Transfer Revenue Settlement (Charge Code 8011) and Day-Ahead Energy Transfer Revenue Settlement (Charge Code 8411)]</p>
<p><u>From CAISO Tariff Section 33.11.1.1.2 (entitled Imbalance Reserve Transfer Revenue):</u></p> <p>An EDAM Entity will ensure that EDAM Transfer revenue for Imbalance Reserves allocated to its EDAM Entity Scheduling Coordinator is thereafter allocated by all applicable EDAM Transmission Service Providers <i>as may be detailed in the EDAM Transmission Service Provider tariff</i>.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 10.3.2 (entitled Imbalance Reserves):</u></p> <p>To the extent the PacifiCorp EDAM Entity receives settlement for Imbalance Reserves on behalf of PacifiCorp BAAs [Balancing Authority Areas], the PacifiCorp EDAM Entity will sub-allocate to Transmission Customers as follows:</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
	[Tables listing sub-allocation methodologies for Day-Ahead Imbalance Reserve Up Tier 1 Allocation (Charge Code 8076), Day-Ahead Imbalance Reserve Up Tier 2 Allocation (Charge Code 8077), Day-Ahead Imbalance Reserve Down Tier 1 Allocation (Charge Code 8086), and Day-Ahead Imbalance Reserve Down Tier 2 Allocation (Charge Code 8087)]
<p><u>From CAISO Tariff Section 33.11.1.1.3 (entitled Reliability Capacity Transfer Revenue):</u></p> <p>An EDAM Entity will ensure that EDAM Transfer revenue for Reliability Capacity allocated to its EDAM Entity Scheduling Coordinator is thereafter allocated by all applicable EDAM Transmission Service Providers <i>as may be detailed in the EDAM Transmission Service Provider tariff</i> and business practices.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 10.3.3 (entitled Reliability Capacity):</u></p> <p>To the extent the PacifiCorp EDAM Entity receives settlement for Reliability Capacity Allocation on behalf of the PACE [PacifiCorp East] or PACW [PacifiCorp West] BAAs, the PacifiCorp EDAM Entity will sub-allocate, as shown below.</p> <p style="text-align: center;">. . . .</p> <p>[Tables listing sub-allocation methodologies for RUC Reliability Capacity Up Tier 1 Allocation (Charge Code 8806), RUC Reliability Capacity Up Tier 2 Allocation (Charge Code 8807), RUC Reliability Capacity Down Tier 1 Allocation (Charge Code 8816), and RUC Reliability Capacity Down Tier 2 Allocation (Charge Code 8817)]</p>
<p><u>From CAISO Tariff Section 33.11.1.2 (entitled Congestion Revenue):</u></p> <p>The CAISO will distribute the Congestion Charge revenue collected from the Transmission Constraints in each</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.1 (entitled Method of Respecting Firm Service):</u></p> <p>Second, except as otherwise provided in Section 4.1.5 of this Attachment T regarding EDAM Legacy Contracts,</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p>Balancing Authority Area in the EDAM Area, including any adjustment for the CAISO Balancing Authority Area in accordance with Section 11 and any adjustment for EDAM Entity Balancing Authority Areas to account for schedules associated with EDAM Legacy Contracts, EDAM Transmission Ownership Rights and registered EDAM Transmission Service Provider transmission customer rights under Sections 33.16, 33.17, and 33.18, respectively, to the applicable Balancing Authority Area within which the Congestion occurred. An EDAM Entity will ensure that Congestion revenue allocated to its EDAM Entity Scheduling Coordinator is further allocated by all applicable EDAM Transmission Service Providers <i>as may be detailed in the EDAM Transmission Service Provider tariff</i> and business practices.</p>	<p>balanced portions of certain Self-Schedules that conform with firm transmission rights will be subject to a reversal of certain congestion impacts as provided for in Section 10.4 of this Attachment T.</p> <p><u>From revised PacifiCorp OATT, Attachment T, Section 10.4 (entitled Day-Ahead Marginal Energy Offset):</u></p> <p>Any settlement to the PacifiCorp EDAM Entity pursuant to Section 33.11.3.9.1 (Marginal Loss Offset), 33.11.3.9.3 (Marginal Congestion Offset), and 33.11.3.9.4 (Marginal Energy Offset) of the MO Tariff shall be sub-allocated to Transmission Customers as follows:</p> <p>[Tables listing sub-allocation methodologies for Day-Ahead Energy and Losses Offset—System (Charge Code 8404) and Day-Ahead Congestion Offset (Charge Code 8704)]</p> <p><u>From revised PacifiCorp OATT, Attachment T, Section 10.4.1 (entitled Day-Ahead Congestion Offset):</u></p> <p>The PacifiCorp EDAM Entity will sub-allocate Day-Ahead Congestion Offset in Charge Code 8704 in a two-step process for each hourly interval. In the first step (“Step One”), the PacifiCorp EDAM Entity will reverse day-ahead congestion price differentials (positive or negative) arising from a PacifiCorp BAA for transmission customers to the extent of their balanced self-schedules submitted to the EDAM associated with firm monthly and longer-term</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
	<p>network or point-to-point OATT transmission rights. If day-ahead congestion revenues available to the PacifiCorp EDAM Entity for the applicable settlement interval to facilitate this reversal are insufficient to effectuate a full reversal of such congestion price differentials, the reversal will be limited to such available funds and will be allocated proportionally to the referenced Step One qualifying self-schedules based on relative congestion exposure. In the second step (“Step Two”), the amount remaining in Charge Code 8704 after the Step One allocation (i.e. the amount remaining in that account for the EDAM Entity to sub-allocate) will be allocated to load and exports not already included in the Step One allocation in proportion to such load and exports. For the avoidance of doubt, this allocation will not apply to any EDAM Legacy Contract Quantity.</p>
<p><u>From CAISO Tariff Section 33.11.2.3 (entitled EDAM RSE Surcharge Allocation):</u></p> <p>Revenue and costs arising from the EDAM RSE failure surcharge(s) distributed in accordance with Section 33.11.2.2 will be allocated to the CAISO Balancing Authority Area for sub-allocation in accordance with the CAISO Tariff and, for all other Balancing Authorities in the EDAM Area, to the applicable Scheduling Coordinator for any further sub-allocation <i>in accordance with the requirements of the applicable tariffs and business practices of the entities within that EDAM Entity Balancing Authority Area.</i></p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 10.3.4 (entitled LSE RSE Failure Surcharge):</u></p> <p>The applicable Scheduling Coordinator for each EDAM Load-Serving Entity in the PacifiCorp EDAM Entity BAAs that fails to meet all of the requirements of the LSE RSE will be allocated to the applicable LSE RSE failure surcharge, as provided in Section 4.3.1.</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p><u>From CAISO Tariff Section 33.11.3.5 (entitled IFM Bid Cost Recovery):</u></p> <p>For each EDAM Entity Balancing Authority Area, the CAISO allocates the adjusted Balancing Authority Area IFM BCR amounts to the EDAM Entity for allocation <i>under the applicable tariff</i> and, for the CAISO Balancing Authority Area, pursuant to Section 11.8.6.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 10.5 (entitled IFM Bid Cost Recovery):</u></p> <p>The MO will allocate to the PacifiCorp EDAM Entity BAAs costs associated with IFM Bid Cost Recovery to the PacifiCorp EDAM Entity. Settlement to the PacifiCorp EDAM Entity pursuant to Section 11.8.2 of the MO Tariff for the IFM Bid Cost Recovery shall be sub-allocated to Transmission Customers as follows:</p> <p>[Table listing sub-allocation methodology for IFM Bid Cost Recovery Tier 2 Allocation (Charge Code 6637)]</p>
<p><u>From CAISO Tariff Section 33.11.3.6 (entitled RUC Bid Cost Recovery):</u></p> <p>For each EDAM Entity Balancing Authority Area, the CAISO allocates the adjusted Balancing Authority Area IFM BCR amounts to the EDAM Entity for allocation <i>under its tariff</i> and, for the CAISO Balancing Authority Area, pursuant to Section 11.8.6.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 10.5 (entitled IFM Bid Cost Recovery):</u></p> <p>Settlement to the PacifiCorp EDAM Entity pursuant to Section 11.8.2 of the MO Tariff for the IFM Bid Cost Recovery shall be sub-allocated to Transmission Customers as follows:</p> <p>[Table listing sub-allocation methodology for IFM Bid Cost Recovery Tier 2 Allocation (Charge Code 6637)]</p>
<p><u>From CAISO Tariff Section 33.18 (entitled Tariff Transmission Service by EDAM Transmission Service Providers):</u></p> <p>The EDAM Transmission Service Provider must <i>amend its tariff</i> to the extent the EDAM Entity deems necessary to</p>	<p>See revised PacifiCorp OATT, Attachment T, Sections 4.1.3.3 (entitled Transmission Rights to an EDAM External Intertie), 4.1.3.4 (entitled Transmission Rights to an EDAM Internal Intertie), 4.1.3.6.1 (entitled Intra-Day Schedule Changes), 4.1.6 (entitled Treatment of</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
account for the transmission capacity it will make available in the Day-Ahead Market, provided such amendments are consistent with this Section 33.	Ownership Rights), and 11.7 (entitled Variable Energy Resource Forecast Charge)
<p><u>From CAISO Tariff Section 33.18.1 (entitled Transmission at EDAM External Interties):</u></p> <p>An EDAM Transmission Service Provider with a transmission system located within an EDAM Entity Balancing Authority Area must coordinate with the EDAM Entity so that the transmission system is available to the Day-Ahead Market and the EDAM Entity has all necessary information to register the transmission service customers' transmission service rights within the EDAM Entity Balancing Authority Area and at EDAM External Interties with the CAISO and other EDAM Entities <i>as provided under the EDAM Transmission Service Provider tariff.</i></p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.2 (entitled Registration of Transmission Rights):</u></p> <p>The PacifiCorp EDAM Entity shall register all firm and EDAM Legacy Contract transmission rights under this Tariff with the MO for purposes of the MO's assignment of Contract Reference Numbers in order to give effect to those transmission rights in the EDAM. Each Transmission Customer shall provide the PacifiCorp EDAM Entity any information required in order for the PacifiCorp EDAM Entity to fulfill its transmission right registration responsibilities under the MO Tariff. The PacifiCorp EDAM Entity will specifically identify for the MO those transmission rights that could support an EDAM Transfer, and the contractual and operational limits on those rights.</p> <p><u>From revised PacifiCorp OATT, Attachment T, Section 8.4.3 (entitled Registration of Transmission Rights):</u></p> <p>The PacifiCorp EDAM Entity shall register all firm and EDAM Legacy Contracts transmission rights under this Tariff as provided in Section 4.1.2 of this Attachment T.</p>
<u>From CAISO Tariff Section 33.18.1.2 (entitled Registration):</u>	See PacifiCorp OATT Section 30.1 (entitled Designation of Network Resources), Section 30.2 (entitled Designation

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p><i>Network integration transmission service customers will follow the EDAM Transmission Service Provider tariff for designation and un-designation of network resources.</i></p>	<p>of New Network Resources), and Section 30.3 (entitled Termination of Network Resources)</p>
<p><u>From CAISO Tariff Section 33.18.2 (entitled Transmission at EDAM Internal Interties):</u></p> <p>An EDAM Transmission Service Provider with a transmission system located within an EDAM Entity Balancing Authority Area must coordinate with the EDAM Entity <i>and the EDAM Transmission Service Provider tariff</i> so that the EDAM Entity will have all necessary information to register transmission service customers' transmission service at EDAM Internal Interties with the CAISO and other EDAM Entities in accordance with the procedures and timelines in the Business Practice Manual for the Extended Day-Ahead Market, which processes may differ depending upon the duration of the transmission rights, e.g., yearly, monthly, weekly or of a shorter duration.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.2 (entitled Registration of Transmission Rights):</u></p> <p>The PacifiCorp EDAM Entity shall register all firm and EDAM Legacy Contract transmission rights under this Tariff with the MO for purposes of the MO's assignment of Contract Reference Numbers in order to give effect to those transmission rights in the EDAM. Each Transmission Customer shall provide the PacifiCorp EDAM Entity any information required in order for the PacifiCorp EDAM Entity to fulfill its transmission right registration responsibilities under the MO Tariff. The PacifiCorp EDAM Entity will specifically identify for the MO those transmission rights that could support an EDAM Transfer, and the contractual and operational limits on those rights.</p> <p><u>From revised PacifiCorp OATT, Attachment T, Section 8.4.3 (entitled Registration of Transmission Rights):</u></p> <p>The PacifiCorp EDAM Entity shall register all firm and EDAM Legacy Contracts transmission rights under this Tariff as provided in Section 4.1.2 of this Attachment T.</p>
<p><u>From CAISO Tariff Section 33.18.2.2.2 (entitled Release of the Transmission):</u></p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.3.6 (entitled Release):</u></p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p>The Scheduling Coordinator representing the transmission rights may determine, on a daily basis, whether to make the full amount or only a portion of its registered transmission service rights available for EDAM Transfers for that day only or a longer timeframe, provided such release is consistent with the registered transmission rights <i>and the EDAM Transmission Service Provider tariff</i>.</p>	<p>Transmission Customers with firm transmission rights over the PacifiCorp transmission system to an EDAM Internal Intertie may release the capacity to the EDAM pursuant to the terms of the MO Tariff.</p>
<p><u>From CAISO Tariff Section 33.18.2.2.3 (entitled Permissible Intra-Day Transmission Schedule Changes):</u></p> <p>If the Scheduling Coordinator for a transmission customer of an EDAM Transmission Service Provider does not release the transmission service rights or schedule its registered firm or conditional firm point-to-point transmission service rights under Section 33.18.2.2.1 or Section 33.18.2.2.2 prior to the Day-Ahead Market, the capacity will be made available for EDAM Transfers in the Day-Ahead Market, and the transmission customer may nonetheless later exercise its rights <i>under the EDAM Transmission Service Provider tariff</i>. If the transmission customer later submits a schedule associated with its registered transmission service rights <i>in accordance with the EDAM Transmission Service Provider tariff</i>, the EDAM Entity Scheduling Coordinator associated with the EDAM Transmission Service Provider will ensure that the CAISO is notified of all such transmission schedules through submission of a Self-Schedule to the CAISO by the EDAM Entity Scheduling Coordinator, which the CAISO will accommodate in the Real-Time Market. The Real-Time Market may re-dispatch if necessary to accommodate the late Self-Schedule of the associated transmission service</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.3.6.1 (entitled Intra-Day Schedule Changes):</u></p> <p>The PacifiCorp EDAM Entity will exercise its authority under Section 33.18.2.2.3 of the MO Tariff to provide instructions to the MO to assign certain intra-day schedule changes a higher scheduling priority than cleared Day-Ahead Schedules. The PacifiCorp EDAM Entity will assign such instructions to the MO on a standing basis for long-term point-to-point wheel-through or export transactions from the PacifiCorp BAAs that are part of a forward showing of a Western Resource Adequacy Program (“WRAP”) participant, such that intra-day Self-Schedules associated with such rights receive the higher scheduling priority in the real-time market. Such WRAP participants must identify to the PacifiCorp EDAM Entity such qualifying transmission rights over the PacifiCorp system as part of a WRAP forward showing in the manner provided in the PacifiCorp CAISO Markets BP. The PacifiCorp EDAM Entity will provide such instructions to the MO two times per calendar year on a schedule provided in the PacifiCorp CAISO Markets BP. For the avoidance of doubt, the higher EDAM scheduling</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p>rights and will afford the Self-Schedule submitted by the EDAM Entity Scheduling Coordinator equal priority to cleared Day-Ahead Schedules unless the CAISO receives instructions that the EDAM Transmission Service Provider that it has assigned the Self-Schedule associated with firm OATT rights, whether point to point, network integration transmission service, or conditional firm, a scheduling priority higher than cleared Day-Ahead Schedules <i>in accordance with the EDAM Transmission Service Provider tariff</i>.</p>	<p>priority for certain intra-day schedule changes under this Section 4.1.3.6.1 and Section 33.18.2.2.3 of the MO Tariff will not create a special curtailment priority under this OATT; such curtailment provisions shall be unaffected by this Section 4.1.3.6.1. PacifiCorp would grant similar treatment and use a similar process upon a Transmission Customer's satisfactory demonstration that certain long-term firm reservations over the PacifiCorp system are part of its compliance with another FERC-approved regional resource adequacy program.</p>
<p><u>From CAISO Tariff Section 33.18.2.3 (entitled Unsold Available Transfer Capability):</u></p> <p>The EDAM Entity Scheduling Coordinator will determine the amount of unsold firm available transfer capability at an EDAM Internal Intertie under the EDAM Transmission Service Provider tariff prior to 10:00 a.m. on the morning of the Day-Ahead Market, accounting for reserve sharing group obligations or other unique circumstances and arrangements <i>as provided in the EDAM Transmission Service Provider tariff</i>.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.3.7 (entitled Unsold ATC Made Available to the Market):</u></p> <p>The PacifiCorp EDAM Entity shall make unsold ATC [Unsold Transfer Capability] available to the MO for purposes of EDAM optimization on timelines contained in the MO Tariff.</p>
<p><u>From CAISO Tariff Section 33.18.2.4 (entitled EDAM Transfer Limits Used for the Day-Ahead Market):</u></p> <p>The CAISO will communicate the quantity of transmission that the Day-Ahead Market utilized for EDAM Transfers to the EDAM Entity Scheduling Coordinator after Market Close of the Day-Ahead Market, which the EDAM Entity associated with the EDAM Transmission Service Provider</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.4 (entitled Scheduling Under this Tariff and the EDAM):</u></p> <p>During PacifiCorp's participation in the EDAM, Transmission Customers shall continue to schedule their transmission service through the PacifiCorp Transmission Provider in the manner provided under Parts II and III of</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p>will ensure the EDAM Transmission Service Provider will thereafter use to determine any remaining transmission to make available <i>in accordance with its tariff</i> and Section 29.</p>	<p>this Tariff. Transmission Customers are advised that the scheduling timelines and associated requirements may be imposed by this Tariff and the MO Tariff, and the Scheduling Coordinator for a Transmission Customer shall be required to comply with both.</p>
<p><u>From CAISO Tariff Section 33.18.3 (entitled Contract Reference Number (CRN)):</u></p> <p>The CAISO will recognize EDAM Transmission Service Provider customer transmission rights <i>as provided under the EDAM Transmission Service Provider tariff</i> subject to the provisions of Section 33.18.1 and Section 33.18.2.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.2 (entitled Registration of Transmission Rights):</u></p> <p>The PacifiCorp EDAM Entity shall register all firm and EDAM Legacy Contract transmission rights under this Tariff with the MO for purposes of the MO's assignment of Contract Reference Numbers in order to give effect to those transmission rights in the EDAM. Each Transmission Customer shall provide the PacifiCorp EDAM Entity any information required in order for the PacifiCorp EDAM Entity to fulfill its transmission right registration responsibilities under the MO Tariff. The PacifiCorp EDAM Entity will specifically identify for the MO those transmission rights that could support an EDAM Transfer, and the contractual and operational limits on those rights.</p>
<p><u>From CAISO Tariff Section 33.18.3.1 (entitled Self-Schedules Associated with a CRN):</u></p> <p>A Scheduling Coordinator that submits a balanced Self-Schedule less than or equal to the capacity associated with the CRN in accordance with Section 33.18.2.2.3 will be assigned a scheduling priority equal to cleared Day-Ahead Self-Schedules in the Real-Time Market unless the CAISO</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.3.6.2 (entitled Transmission Rights Internal to a PacifiCorp EDAM BAA):</u></p> <p>Transmission rights internal to the PacifiCorp BAAs shall be honored in the following manner: Transmission Customers holding such rights shall have the right to submit Self-Schedules to the MO. The EDAM</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p>receives instructions from the EDAM Transmission Service Provider that it has assigned the balanced Self-Schedule associated with firm OATT rights a scheduling priority higher than cleared Day-Ahead Self-Schedules <i>in accordance with the EDAM Transmission Service Provider tariff</i>.</p> <p style="text-align: center;">. . . .</p> <p>(i) Each EDAM Entity will be responsible for managing Transmission Constraints after the Day-Ahead Market according to Section 29, Section 33.7.5, <i>and the EDAM Transmission Service Provider tariff</i>.</p>	<p>optimization does not guarantee physical flows of submitted Self-Schedules, but balanced Self-Schedules associated with a Contract Reference Number established pursuant to the process in Section 4.1.2 of this Attachment T shall be entitled to the scheduling priority in the EDAM pursuant to the terms of the MO Tariff. Self-Schedules not associated with such transmission rights registered with a Contract Reference Number will be given such other scheduling priority as determined by the MO Tariff. Unscheduled transmission capacity internal to the PacifiCorp BAAs will be made available to the MO for purposes of market optimization.</p> <p>See revised PacifiCorp OATT, Attachment T, Section 4.1.3.6.1 (entitled Intra-Day Schedule Changes) and Section 12.3 (entitled Management of Contingencies and Emergencies)</p>
<p><u>From CAISO Tariff Section 33.18.3.3 (entitled Transmission Not Available in the Day-Ahead Market):</u></p> <p>If the CAISO is informed through the prospective EDAM Entity implementation process or by the EDAM Entity Scheduling Coordinator for the EDAM Transmission Service Provider that accommodation of incremental intra-day schedules in the Real-Time Market should be unavailable in the Day-Ahead Market <i>according to the EDAM Transmission Service Provider tariff</i>, the CAISO will accept a notification from the EDAM Entity Scheduling Coordinator associated with the EDAM Transmission Service Provider and will adjust Day-Ahead Market availability of the impacted</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.3.8 (entitled Transmission Deemed Unavailable to the EDAM):</u></p> <p>The PacifiCorp EDAM Entity reserves the right to hold back transmission facilities or capacity from the MO's use when the PacifiCorp EDAM Entity, in its sole discretion, deems such a hold back necessary to (a) maintain the reliability of the PacifiCorp BAAs or (b) give effect to any contract right, including EDAM Transmission Ownership Rights, that the PacifiCorp EDAM Entity determines is not adequately addressed by the rules of this Tariff and the MO Tariff for EDAM participation. The PacifiCorp EDAM</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
transmission elements and the associated transmission service rights.	Entity shall inform the MO of any such hold backs of transmission capacity under the timeline prescribed by the MO Tariff.
<p data-bbox="201 443 993 516"><u>From CAISO Tariff Section 33.23 (entitled Transmission Service Requirements for EDAM Resources):</u></p> <p data-bbox="201 553 1024 699">An EDAM Resource Scheduling Coordinator must obtain transmission service from an EDAM Transmission Service Provider, which may be satisfied through the following options:</p> <p data-bbox="201 737 1052 846">(a) The EDAM Resource is a designated network resource <i>under the terms of an EDAM Transmission Service Provider tariff</i>;</p> <p data-bbox="201 883 1024 992">(b) The EDAM Resource reserves firm point-to-point transmission service of any duration <i>under the terms of an EDAM Transmission Service Provider tariff</i>, or</p> <p data-bbox="201 1029 978 1138">(c) The EDAM Resource is associated with an EDAM Legacy Contract or an EDAM Transmission Ownership Right.</p> <p data-bbox="201 1175 1031 1393">If options (a), (b), or (c) above are not satisfied, the CAISO will notify the EDAM Entity associated with the EDAM Transmission Service Provider so that the EDAM Transmission Service Provider assesses a transmission charge based on the transmission rate for the lowest duration of firm transmission service offered <i>under its tariff</i>,</p>	<p data-bbox="1083 443 1854 552"><u>From revised PacifiCorp OATT, Attachment T, Section 9.2 (entitled Transmission Service Required for EDAM Resources):</u></p> <p data-bbox="1083 589 1906 1430">Each EDAM Resource Facility must obtain transmission service under this Tariff in a quantity sufficient to cover its cleared day-ahead and real-time bids or Self-Schedules in one of the following manners: (a) the EDAM Resource Facility is a designated Network Resource under this Tariff; (b) the Scheduling Coordinator for the EDAM Resource Facility reserves firm point-to-point transmission service of any duration under this Tariff; or (c) the EDAM Resource Facility is associated with an EDAM Legacy Contract or an EDAM Transmission Ownership Right. Upon its own determination or upon notification by the MO that an EDAM Resource Facility has not satisfied this requirement, the PacifiCorp EDAM Entity shall assess the Scheduling Coordinator a charge for the quantity of transmission in excess of the required reservation based on the transmission rate for the shortest duration of firm transmission service offered under this Tariff applied to the period of time in which the relevant EDAM Resource Facility has failed to comply with this requirement. Any use of transmission associated with generation in excess of cleared bids, Self-Schedules, or MO Dispatch Instructions shall be subject Unauthorized Use charges pursuant to Schedule 11.</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p>which may be a daily firm or hourly firm transmission service.</p> <p style="text-align: center;">. . . .</p> <p>The specific transmission service requirements and any associated transmission service charges or penalties will be <i>determined in accordance with the EDAM Transmission Service Provider tariff</i>.</p>	
<p><u>From CAISO Tariff Section 33.26 (entitled Historical Revenue Recovery and Charges):</u></p> <p>Transmission service charges for Day-Ahead Market transactions serving Load within an EDAM Entity Balancing Authority Area are <i>governed by the applicable EDAM Transmission Service Provider tariff</i>.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 3.6 (entitled EDAM Transmission Service Charges):</u></p> <p>During PacifiCorp's participation in the EDAM, Transmission Customers shall continue to reserve, schedule, and pay for transmission service as provided in this Tariff including this Attachment T.</p>
<p><u>From CAISO Tariff Section 33.30.1 (entitled Bids):</u></p> <p>A Scheduling Coordinator may submit a Bid in the Day-Ahead Market for an EDAM Resource eligible to participate in the Day-Ahead Market <i>according to the EDAM Transmission Service Provider tariff</i> and Section 33, while Scheduling Coordinators for EDAM Resources self-providing Ancillary Services must provide a Submission to Self-Provide Ancillary Services.</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.2 (entitled Bids and Day-Ahead Self-Schedules by EDAM Resources):</u></p> <p>Each EDAM Resource shall, through its Scheduling Coordinator, comply with the MO Tariff's requirements to submit energy bids or Day-Ahead Self-Schedules into both the EDAM and the EIM for each EDAM Resource Facility under its ownership or control.</p>
<p><u>From CAISO Tariff Section 33.30.8.1 (entitled EDAM External Interties):</u></p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.3.3 (entitled Transmission Rights to an EDAM External Intertie):</u></p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
<p>An EDAM Entity will facilitate scheduling of export transactions from its Balancing Authority Area to EDAM External Interties pursuant to Section 33.18 <i>and the EDAM Transmission Service Provider tariff</i> or, in the case of the CAISO Balancing Authority Area, this CAISO Tariff.</p>	<p>Transmission Customers with firm transmission rights over the PacifiCorp transmission system to an EDAM External Intertie must Self-Schedule rights to use them to import or export energy, as the case may be. The three pathways described in Section 33.18.2.2 of the MO Tariff shall not apply to rights associated with EDAM External Interties.</p>
<p><u>From CAISO Tariff Section 33.31.3.2 (entitled Reliability Margin):</u></p> <p>Once the upper-bound limit of the net EDAM Transfer export constraint is derived, the CAISO or the EDAM Entity may further reduce this limit for its Balancing Authority Area by an additional reliability margin that reflects an amount of non-exportable capacity held back in anticipation of needing to respond to reliability conditions <i>as may be permitted under the EDAM Transmission Service Provider tariff</i> or the CAISO Tariff, as applicable, including associated business practices</p>	<p><u>From revised PacifiCorp OATT, Attachment T, Section 4.1.7 (entitled Net EDAM Transfer Constraint):</u></p> <p>The PacifiCorp EDAM Entity shall be responsible for activating the net export EDAM Transfer constraint according to the terms of Section 33.31.3 of the MO Tariff. The PacifiCorp EDAM Entity may enable the configurable EDAM net export transfer constraint set forth in Section 33.31.3 of the MO Tariff consistent with the process set forth in the PacifiCorp CAISO Markets BP if there is observed risk of non-performance or non-delivery by supply overall or from intertie schedules, if there is an observed risk that additional capacity will be needed to respond to reliability conditions, or if Good Utility Practice or operator judgement otherwise requires.</p>
<p><u>From CAISO Tariff Section 33.31.4 (entitled CAISO Forecast of BAA Demand and Variable Energy Resource Forecast for EDAM Entities):</u></p> <p>A Demand Forecast submitted by the EDAM Entity that will be utilized as the CAISO Forecast of BAA Demand must</p>	<p>See revised PacifiCorp OATT Schedule 10 (entitled Real Power Losses) and Attachment T, Section 15.3 (entitled Temporary Schedule 10 Real Power Losses)</p>

CAISO Tariff Provisions ³⁶	PacifiCorp OATT Provisions
contain the expected transmission loss <i>as defined in the EDAM Entity's tariff</i> .	

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the above-captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 18th day of February, 2025.

/s/ Ariana Rebancos
Ariana Rebancos