



# Congestion Revenue Allocation - PacifiCorp

- Interested in a durable solution not a quick fix
- Already operating in EDAM and made significant system investments. Other entities are making decisions on current design
- Retain rights of entity to suballocate congestion revenues per entity tariff
- CRA is not the only reason entities use self schedules
- CAISO should evaluate each option through a systems impact lens:
  - Implementation complexity (CAISO and EDAM Entities)
  - Required system changes
  - Feasible timelines
- Additional analysis will inform decision-making:
  - Congestion and revenue across the wider footprint
  - EDAM market results and congestion revenues
  - Constraint interactions across BAAs
  - Mock simultaneous feasibility test

- **Design Concept #1** – Enhancement to Phase 1 design, CRs allocated for cleared balanced schedules associated with eligible rights
  - Relatively simple design concept but may introduce significant operational complexity relative to short-term benefits.
  - *PacifiCorp recommendation:* **Continue exploring**
- **Design Concept #2** – Established historical baseline of CR entitlements for CRRs and eligible OATT rights
  - Does not reflect forward-looking system changes and risks misaligned outcomes over time.
  - *PacifiCorp recommendation:* **Do not move forward**
- **Design Concept #3** – CR financial entitlements established for eligible OATT rights and CAISO CRRs based on a common SFT
  - Potential long-term solution, but introduces significant complexity and requires substantial additional analysis.
  - *PacifiCorp recommendation:* **Continue exploring**