



## **PACIFICORP'S COMMENTS ON THE EIM ENTITY READINESS CRITERIA**

### **I. INTRODUCTION**

PacifiCorp hereby submits the following comments to the California Independent System Operator Corporation ("ISO") on its proposed Energy Imbalance Market ("EIM") readiness criteria. PacifiCorp appreciates the opportunity to provide comments on this initiative for the ISO's consideration.

### **II. COMMENTS**

PacifiCorp generally supports the ISO's EIM readiness criteria proposal with respect to the proposed categories and metrics, criteria, and threshold proposals for each category.

PacifiCorp requests that the ISO consider adding criteria under its Data Monitoring Readiness category to require the Department of Market Monitoring to produce a report that provides an explanation of any anomalous pricing, and publish such report as a criterion of market readiness.

### **III. CONCLUSION**

PacifiCorp appreciates the ISO's consideration of these comments and looks forward to the ISO's response.