

Comments – Revisions Matrix
EIM BP Version Posted 10/13/14 – Comments Received by 10/27/14

| Section | Comment/Description | Commenter | PacifiCorp Response |
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| General | Powerex notes that, when responding to customer comments, PacifiCorp removes information that indicates the identity of customers that comment on its business practices. We believe that including the identity of customers that provide comments in a stakeholder process, as is CAISO’s practice, facilitates stakeholder dialogue and helps to ensure that there is meaningful discussion on complex technical and policy issues associated with the implementation of a new EIM. As a result, Powerex expressly agrees and consents to PacifiCorp identifying Powerex as the author of these comments. | Powerex | PacifiCorp has been posting its comments/response matrices on its EIM BP with a column that identifies the commenter. However, it has been PacifiCorp’s normal business practice process to post original comments with the commenter’s identity redacted. PacifiCorp has reposted Powerex’s comments document received October 27, 2014 as originally submitted, as requested by Powerex. On a going forward basis, PacifiCorp plans to post comments received on business practices with the commenter’s identity revealed to facilitate meaningful stakeholder discussion, unless the commenter specifically requests that their identity remain anonymous. |
| 1 Introduction | The terms “import” and “export” are undefined in both this Business Practice and in PacifiCorp’s OATT. Transactions categorized as exports are a key component of the Measured Demand used to allocate costs to Transmission Customers (i.e., Charge Codes 8989, 8999, 4989, 4999, 66780 and 7056). To avoid confusion in settlements these key-billing components should include a rigorous definition in this Business Practice. | Deseret | PacifiCorp clarifies in this response that for purposes of intertie settlement and allocations of uplifts and neutrality, imports and exports are defined as the transaction point between PacifiCorp’s BAA and another BAA. The customer assessed intertie instructed imbalance or allocations of uplifts and neutrality charges for exports is the purchase/selling entity “PSE” listed on the leg of tag that crosses the transaction point. PacifiCorp posted a sample e-Tag illustrating this in its previously posted comments/responses matrix . |

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| 7.1 and 7.2 Generation and Transmission Outages | <p>Bonneville has concerns with the proposed revisions to section 7 of the business practice. Section 7.1 now purports to place obligations on “generator operators of Transmission Customers.” Similarly, section 7.2 attempts to create obligations for “transmission operators of Transmission Customers.” Those generator and transmission operators, however, may not have any relationship with PacifiCorp that would require them to follow PacifiCorp’s business practice. Thus, the revisions may not be enforceable.</p> | <p>BPA</p> | <p>PacifiCorp agrees with Bonneville’s comments and has revised EIM BP Sections 7.1 and 7.2 accordingly. PacifiCorp through its OATT may only impose obligations directly upon its own Transmission Customers.</p> |
| 7.1.2 Unplanned Generation Outages | <p>Until the MO’s Outage Management System becomes available, there are several concerns with the interim unplanned outage/derate reporting process.</p> <p>1) Several phone numbers have been presented by PacifiCorp for reporting unplanned derates and outages. Currently, posted on PacifiCorp’s OASIS site is the contact information for PacifiCorp Outage Coordination (503) 251-5157. Historically, and in coordination with PacifiCorp’s NERC Compliance department, Generation Operators have contacted PacifiCorp’s GridOps @ (503) 251-5210 for reporting unplanned generation outages and derates. Finally, the EIM BP instructs generators to report unplanned outages/derates to (503) 251-5270. It’s unclear from the BP if one or all of these numbers should be notified. PacifiCorp’s unplanned outage/derate reporting processes should be reviewed and a single number established for reporting.</p> <p>2) Section 7.1.2 requires the submittal of an email</p> | <p>Deseret</p> | <ol style="list-style-type: none"> 1) PacifiCorp will be updating its OASIS home page and has revised its EIM BP to include one phone number for planned outages and a second number for unplanned outages/derates. 2) The outage information is only required to be included in the form, not the body of the email. PacifiCorp has modified its EIM BP to clarify this. 3) PacifiCorp is in the process of modifying both the Generation and Transmission Outage notification forms which will address this concern. 4) The Location Code requirement will be removed from the Generation Outage form. 5) No follow up notification is required as long as the information provided regarding the outage ending time is accurate. |

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| | <p>with a Generation Outage form attached. The data reported in the email is redundant with the information in the Generation Outage form. For simplicity, efficiency and accuracy, PacifiCorp should do away with either the attachment or the requirement to report data in the body of the email.</p> <p>3) The Generation Outage form referred to in the EIM BP requires the user to select the “status/action” type. It isn’t clear from the form how to “select” the type of outage/derate.</p> <p>4) The email and form data submittals require a “Location Code” for the generator. Where can this information be found?</p> <p>5) It’s unclear from the BP if an outage/derate described in the initial notification email as ending XX:XX requires a subsequent email notifying PacifiCorp that the unit’s capability has returned to full capacity.</p> | | |
| <p>7.1.2 Unplanned Generation Outages</p> | <p>What will happen if a generation operator attempts to enter a generation Base Schedule in the BSAP that exceeds the generator’s availability implied in the MO’s OMS for the same period? Under PacifiCorp’s Tariff, a generation operator who has communicated physical changes in a generators output to the MO prior to the FMM may receive IIE.</p> | <p>Deseret</p> | <p>A generator’s maximum possible generation in BSAP is not effected by notifications submitted to the MO’s OMS. Transmission Customers are able to submit a schedule in BSAP over the availability implied in the MO’s OMS which could result in imbalance.</p> |
| <p>8.1.1 BSAP</p> | <p>“If the Transmission Customer fails to enter the expected output value of the resource in BSAP for any individual Operating Hour, BSAP will default to 0 MW for that Operating Hour.”</p> | <p>Deseret</p> | <p>The CAISO’s EIM BPM, Section 10.4 provides for a recovery approach and lists a series of steps that may be implemented In the event that data exchange and/or communication between the</p> |

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| | <p>During periods of sustained outages of the BSAP, similar to the one seen during the parallel testing period in October 2014, generators could incur significant Imbalance Energy penalties.</p> <p>The EIM Business Practice does not address the case where the BSAP is down or unavailable for the submittal of generation Forecast Data. A contingency process needs to be developed for addressing potential outage of the BSAP and included in the EIM BP.</p> | | <p>CAISO and the PacifiCorp EIM Entity are disrupted. For example, in the event of BSAP failure, the CAISO could use the generation schedule from the most recent hour prior to the disruption until the disruption is resolved. If the disruption remains unresolved, the CAISO may implement additional steps as listed in its EIM BPM. PacifiCorp has added information to its EIM BP describing actions in the event of system failure.</p> <p>PacifiCorp highly recommends that Transmission Customers submit hourly generation schedules well in advance of the upcoming operational hour in order to mitigate the effects of BSAP disruption.</p> |
| <p>8.2 Interchange Forecast Data</p> | <p>The following statements contradict:</p> <p><i>“Transmission Customers must submit e-Tags by T-57 of each Operating Hour in order for those transactions to be considered part of the Transmission Customer Base Schedule.”</i></p> <p><i>“If, for any reason, e-Tag information is not submitted into the MO’s BSAP application by T-55, the Interchange will not be included as part of the Transmission Customer Base Schedule.”</i></p> <p>If e-Tags must be submitted by T-57 to be considered part of the Base Schedule, an e-Tag submitted after T-57 (including those between T-57 and T-55) cannot be included as part of the Base Schedule.</p> <p>The inclusion of <u>Pending</u> tags in financially binding settlements is contrary to established market practice. It’s clear from this section PacifiCorp would like to minimize the time between the submittal</p> | <p>Deseret</p> | <p>The first referenced statement requires Transmission Customers to submit e-Tags to PacifiCorp by T-57 of each Operating Hour; the second statement sets forth the timing for the <u>PacifiCorp EIM Entity</u> to submit e-Tag information into the MO’s BSAP system (by T-55). The PacifiCorp EIM Entity will process e-Tags received by T-57, whether or not the tags are fully approved (which constitutes “pending” status) and submit them to BSAP for inclusion in the Transmission Customer’s Base Schedule at T-55. As stated in the EIM BP, the PacifiCorp EIM Entity requires a minimum of two minutes following submission of an e-Tag to forward the e-Tag information into BSAP.</p> <p>Adjustments to submitted e-Tags after T-57 may be subject to imbalance settlement.</p> |

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| | deadline of Base Schedules and the operational hour, however, the creation of the dead-zone between T-57 and T-55 in addition to the inclusion of Pending e-tags causes market uncertainty and ambiguity. | | |
| 9 Settlements | If a generator ramping symmetrically across an hour from a Base Schedule in the first hour of 200MW and a Base Schedule in the second hour of 300MW, what pricing will be used to settle the ramp MWs? | Deseret | Generation Uninstructed Imbalance Energy is settled at the applicable 5-minute LMP. No separate settlement currently exists specifically for ramping MWs. This matter will be addressed during the CAISO's EIM Year 1 Enhancements initiative beginning this month (November). |
| 9.1 Instructed Imbalance Energy (IIE) | Please specify if PacifiCorp will settle these IIE charges at the same 15-min and 5-min intervals as calculated by the EIM MO. The EIM MO calculates and uses Expected Energy billing determinants for settlements. Please clarify if PacifiCorp will make the same Expected Energy data available to its customers to help validate settlement. Please explain the circumstances for adjustments of IIE due to 'adjustments for VER forecasts'. | SCE | PacifiCorp will settle Instructed Imbalance Energy (IIE) charges at the same 15-minute (FMM) and 5-minute (RTD) intervals as calculated by the MO, pending confirmation from CAISO. PacifiCorp will provide the appropriate billing determinants in the invoices issued to non-participating Transmission Customers. PacifiCorp will settle Generation UIE based on actual meter data, and as such, will not need to provide Expected Energy data. For most of the Nonparticipating Resources the Expected Energy will equal the Base Schedule. "Adjustments for VER forecasts" refers to updated VER forecasts provided by the Transmission Customer's VER forecasting agent in real-time, which will result in FMM and RTD Settlements, pending confirmation from CAISO. |

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| 9.2 Uninstructed Imbalance Energy (UIE) | <p>Please specify if PacifiCorp will settle these UIE charges at the same 5-min intervals as calculated by the EIM MO.</p> <p>The EIM MO calculates and uses Expected Energy billing determinants for settlements. Please clarify if PacifiCorp will make the same Expected Energy data available to its customers to help validate settlement.</p> | SCE | <p>PacifiCorp will settle Uninstructed Imbalance Energy (UIE) charges at the same 5-minute intervals as calculated by the MO. PacifiCorp will provide the appropriate billing determinants in the invoices issued to non-participating Transmission Customers, which will primarily consist of the Base Schedule and metered generation for non-VER resources. Expected Energy will primarily be equal to the Base Schedule and therefore will not be of value in settlements.</p> |
| 9.2 Uninstructed Imbalance Energy (UIE) | <p>The proposed language appears to apply, for the first time, charges determined in the CAISO EIM to PacifiCorp transmission customers who use their OATT transmission rights to schedule intrachange transactions. Powerex requests that PacifiCorp confirm or otherwise clarify the conditions under which these EIM charges will apply. Specifically, Powerex requests that PacifiCorp answer the following questions:</p> <p>For an intrachange schedule submitted by a PacifiCorp transmission customer <i>prior to</i> T-57 minutes:</p> <p>a. Please confirm that schedule will be part of the</p> | Powerex | <p>At T-57, all Forecast Data including generation Forecast Data through BSAP or Interchange/Intrachange Forecast Data through e-Tags, must be submitted to the PacifiCorp EIM Entity, becomes the Transmission Customer's financially binding Base Schedule at T-55, and is utilized as the basis to measure imbalance. Effective December 1, 2014, subject to the Federal Energy Regulatory Commission (FERC) approval, a PacifiCorp Transmission Customer who submits an Intrachange e-Tag prior to T-57 is subject to Uninstructed Imbalance Energy (UIE) charges or payments under PacifiCorp's OATT Schedule 4. If</p> |

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| | <p>Transmission Customer Base Schedule.</p> <p>b. Please confirm that the transmission customer will not be assessed Uninstructed Imbalance Energy charges.</p> | | <p>the actual, integrated energy amount of Intrachange is different than the Intrachange component of the Transmission Customer Base Schedule, such Transmission Customer will be assessed a UIE charge or payment for the period of the deviation at the applicable Load Aggregation Point (LAP) price. Between November 1, 2014 and December 1, 2014, UIE is not assessed for the Intrachange component of the Transmission Customer Base Schedule under PacifiCorp’s OATT Schedule 4.</p> |
| <p>9.2 Uninstructed Imbalance Energy (UIE)</p> | <p>For an intrachange schedule submitted by a PacifiCorp transmission customer submits <i>after</i> T-57 minutes:</p> <p>a. Please confirm that schedule will not be part of the Transmission Customer Base Schedule.</p> <p>b. Please confirm that the transmission customer will be assessed Uninstructed Imbalance Energy charges or payments.</p> <p>c. Please confirm that such charges or payments will be determined by the Locational Marginal Prices established in the EIM at the respective Point of Receipt and Point of Delivery of the intrachange schedule.</p> <p>d. Please confirm that the transmission customer will be assessed Uninstructed Imbalance Energy charges or payment in addition to the charges that apply to the reservation and use of transmission service under PacifiCorp’s OATT.</p> <p>e. Please confirm that the Uninstructed Imbalance Energy charges or payments that apply to this</p> | <p>Powerex</p> | <p><u>In response to a. and b.:</u> Because the Transmission Customer Base Schedule becomes binding at T-55, PacifiCorp cannot guarantee that Intrachange e-Tags submitted between T-57 and T-55 will NOT become part of the financially binding Base Schedule at T-55. While PacifiCorp estimates that it will need at least 2 minutes to submit e-Tags into BSAP on behalf of non-participating resources for the Interchange and Intrachange components of the Base Schedule, there is no guarantee that an e-Tag submitted at T-56 will not get into BSAP in time to become part of the financially binding Base Schedule (at T-55). E-Tags submitted after T-55 will not be part of the financially binding Base Schedule.</p> <p><u>In response to c.:</u> Under PacifiCorp’s OATT Schedule 4, as of December 1, 2014, subject to FERC’s approval, a Transmission Customer who submits an Intrachange e-Tag after T-57 will be subject to UIE charges or payments settled at “the</p> |

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| | <p>intrachange schedule will be the same regardless of whether the schedule uses Firm or Non-Firm transmission service.</p> <p>f. Please confirm that PacifiCorp, as the EIM Entity Scheduling Coordinator in the CAISO EIM, will be charged for Uninstructed Imbalance Energy by the CAISO.</p> <p>g. Please confirm that PacifiCorp, as the EIM Entity Scheduling Coordinator in the CAISO EIM, will also receive the difference in the EIM LMPs between the Point of Receipt and Point of Delivery in the form of a Real-Time Congestion Imbalance Offset.</p> <p>h. Please confirm that PacifiCorp will allocate revenues received in the form of a Real-Time Congestion Imbalance Offset to PacifiCorp Measured Demand (<i>i.e.</i>, to PacifiCorp load and exports), and will not return that revenue to the PacifiCorp transmission customers incurring those charges as a result of using their PacifiCorp OATT rights to schedule intrachange transactions.</p> | | <p>applicable LAP price, as determined by the MO under Section 29.11(b)(3)(C) of the MO Tariff, less the price component for marginal losses.”</p> <p><u>In response to d.:</u> A customer with generation, load, or intrachange effective December 1, could be assessed UIE as well as transmission service under the OATT.</p> <p><u>In response to e.:</u> PacifiCorp addressed this comment in its filed answer to Powerex’s comments in FERC Docket NO. ER15-9. The treatment of UIE, whether associated with metered load, generation, or Intrachange will be unaffected by the type (<i>i.e.</i>, the “firmness”) of transmission service purchased by the Transmission Customer. This is the same situation as with the pre-EIM determination of Energy Imbalance Service, based on an hourly proxy price, which was independent of the type of affected transmission service. Under the EIM, however, there may be a price differential between UIE associated with a generator and UIE associated with a load, but this difference will occur regardless of the proposed change in the treatment of Intrachange and the type of transmission service purchased by the Transmission Customer.</p> <p><u>In response to f.:</u> The PacifiCorp EIM Entity Scheduling Coordinator will be assessed UIE by the CAISO for the non-participating resources and loads in PacifiCorp’s BAAs.</p> <p><u>In response to g.:</u> The CAISO will allocate the Real-Time Congestion Offset for each EIM Entity</p> |

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| | | | Balancing Authority Area to the applicable EIM Entity Scheduling Coordinator in accordance with CAISO Tariff Section 11.5.4.1(d). The CAISO's calculation of the Real-Time Congestion Offset is set forth in the CAISO's tariff in Section 11.5.4.1.1. <u>In response to h.:</u> Pursuant to PacifiCorp's OATT Attachment T Section 8.5.2, any charges to the PacifiCorp EIM Entity for the EIM real-time congestion offset shall be allocated to Transmission Customers on the basis of Measured Demand. |
| 9.5 EIM Uplifts | The EIM MO settles these market uplifts at 5-min intervals, please clarify if PacifiCorp intends to do the same, and if PacifiCorp will provide the market uplift totals as allocated to PACW and PACE by the EIM MO. | SCE | PacifiCorp intends to settle market uplifts under EIM BP Section 9.5 at 5-minute intervals and will provide market uplift totals calculated by the MO for PACW and PACE in Transmission Customer invoices. |
| 9.7 Operating Reserve Obligations | When will this charge code be finalized? Are there information on the determination of required amount of Operating Reserve to procure and the charge codes associated with those payments? | SCE | PacifiCorp is waiting for response from the CAISO regarding its charge codes under which it will allocate Operating Reserve Obligations charges and payments to the PacifiCorp EIM Entity. Pursuant to its compliance filing filed October 8, 2014 in FERC Docket No. ER14-2544, and subject to FERC approval, PacifiCorp will sub-allocate payments received from the CAISO to Transmission Customers with EIM Participating Resources on a ratio-share basis and will not sub-allocate charges received from the CAISO to Transmission Customers. |

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| 10.4 Disputes Regarding MO Charges or Payments to the PacifiCorp EIM Entity Raised by TCs or ICs | <p>Please clarify if there is a specific time limit and dispute amount threshold for these disputes, and if there is not, please state so.</p> <p>Please provide a timeline and deadlines for bringing disputes to PacifiCorp attention, in order to meet the MO dispute window process.</p> | SCE | <p>No dispute amount threshold exists under this provision 10.4. The PacifiCorp EIM Entity has until the CAISO's 77th business day following the Trading Day which contains the disputed settlement (T+77B) to raise a dispute with the CAISO on behalf of Transmission Customers and Interconnection Customers. The PacifiCorp EIM Entity has 22 business days to raise a dispute with the CAISO based on final CAISO settlement statements which are issued at T+55B. In order to ensure timely submission of disputes to the MO, PacifiCorp has added language to its EIM BP requiring that a Transmission Customer or an Interconnection Customer notify the PacifiCorp EIM Entity of any disputes it would like PacifiCorp to raise with the CAISO on its behalf at least 7 calendar days prior to the CAISO's T+77B deadline. PacifiCorp is currently reviewing potential solutions for providing customers access to T+55B settlement data as soon as possible in order to provide customers with as much review time prior to the T+77B deadline, including potentially sharing the data on an FTP site in raw form prior to processing the data into PacifiCorp monthly invoices.</p> |