

Stakeholder Input on Topics/Questions for discussion at June Stakeholder Meeting

Stakeholder	Topic/Question
Kenna Hagan, Black Hills	Topic to cover how operation of jointly owned assets will be handled. This could relate to generators, transmission lines and substations.
Eddie Abadi, BPA	<p>Transmission Facilities: One broad group of questions centered on jointly owned transmission facilities, and what happens to rights on those.</p> <ul style="list-style-type: none"> • How will the planned Boardman-to-Hemingway transmission line and the ISO Transmission Planning Process intersect? • How will joint ownership of facilities be treated under the PTO? • How will planned joint ownership be treated under the PTO, i.e. joint ownership that has been proposed, but not taken effect prior to the conversion to the PTO? <p>Transition Agreement:</p> <ul style="list-style-type: none"> • Can we have more detail about the “Transition Agreement”? Timeline? Stakeholder Process? Content? <p>Contract Conversion:</p> <ul style="list-style-type: none"> • Please provide any clarity you can on how non-tariff related or “rate schedule” contracts will be handled. • How will “Qualified legacy contracts” be defined? <p>CRRs: Below is a list of general Congestion Revenue Rights (CRR) questions:</p> <ul style="list-style-type: none"> • A general primer on CRRs would be helpful • Who will be allocated CRRs? Load serving entities with Network Transmission agreements? Point-to-Point Customers? • How will the amount of CRRs be determined? • On what transmission paths will the CRRs apply to? • Can CRRs be both positive and negative, meaning can they result in payments to the CRR holder <i>and</i> payments from the CRR holder? <p>Other Questions</p> <ul style="list-style-type: none"> • How will wheel-throughs between PACW and PACE be handled? <ul style="list-style-type: none"> ○ (i.e., wheeling through PACW over Idaho and then into PACE). • Please explain how behind-the-meter generation will be treated if PAC joins as a PTO. • Can one self-supply ancillary services in the ISO? • How often are different rates updated? (This includes TAC, GMC, and what currently comprise Schedule 1-6.) • How transparent will the rate-making process be? Will it be similar to the formula rate process? • Has PacifiCorp started looking into what portions of its system would be considered part of the interconnected system with the CAISO and which portions would remain under PacifiCorp's control? If so what does this look like? • How will PacifiCorp address Maximum Import Capability (MIC) allocation for Resource Adequacy imports?

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Eric Espenhorst, Seattle City Light	<ul style="list-style-type: none"> • Will PacifiCorp provide a schedule for when it will develop and share a comprehensive cost-benefit analysis of the proposed integration? • Will embedded loads be better off if PacifiCorp pursues Full Market Integration with the CAISO? • Will independent generators be better off if PacifiCorp pursues Full Market Integration with the CAISO? • Is the decision to pursue Full Market Integration permanent or reversible, and if so – under what conditions it would pursue exiting the ISO? • Is NV Energy considering Full Market Integration with the CAISO? • What will be the effect of PacifiCorp’s Full Market Integration with the CAISO on loads currently outside PacifiCorp’s BAA (and outside the CAISO) that are currently being served by resources within PacifiCorp’s BAA? • How would PacifiCorp’s Full Market Integration with the CAISO impact the Bonneville Power Administration’s ability to serve its preference power loads within PacifiCorp’s BAA?
Karen McDonald, Powerex	<p><u>Topic A:</u> PacifiCorp’s planned approach to working with its transmission customers with existing transmission service agreements to determine how the rights under those contracts will be upheld in the CAISO framework.</p> <ol style="list-style-type: none"> 1. Will transmission customers be able to fully utilize their existing OATT rights if PacifiCorp joins a regional ISO? <ol style="list-style-type: none"> a. If not, what restrictions will be imposed on this use? b. What new charges, if any, will apply to transmission customers utilizing existing OATT rights? c. Under a regional ISO, how will the scheduling priority of existing PacifiCorp OATT rights be ensured? 2. Does PacifiCorp anticipate a process for “converting” OATT rights into financial transmission rights? <ol style="list-style-type: none"> a. If so, what will the financial rights look like? b. Currently, Firm OATT rights on PacifiCorp’s system give the transmission customer the ability to earn value on congested paths in both the day-ahead and real-time timeframes. How will this be reflected in the “conversion” to financial rights? c. Transmission customers with Firm OATT rights have a right, but not an obligation, to schedule on those rights. How will this optionality be reflected in the “conversion” to financial rights? d. Current Long-Term Firm OATT rights include renewal rights. How will these renewal rights be reflected in any conversion to financial rights? 3. Will PacifiCorp continue to sell transmission service under the OATT

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	<p>framework if it joins a regional ISO?</p> <p>4. How will PacifiCorp continue to honor renewal rights under Long-Term Firm OATT reservations if it joins a regional ISO?</p> <p>5. How will PacifiCorp ensure that transmission customers whose use of PacifiCorp transmission facilities is paid for under OATT rights are not charged a second time through a Transmission Access Charge (TAC)?</p> <p>6. Powerex understands that PacifiCorp will negotiate with existing transmission customers on a case-by-case basis to “attempt[] to negotiate changes to Existing Contracts to align the contract’s scheduling and operating provisions with the ISO’s scheduling and operational procedures, rules and protocols, and minimize costs of administering the contract whole preserving their financial rights and obligations.” (Jan. 27 Slide 33)</p> <p>a. Can PacifiCorp provide a roadmap, list of guiding principles or approach it intends to use to negotiating these changes?</p> <p>b. It would be helpful to understand the types of scheduling and operating provisions of Existing Contracts PacifiCorp and CAISO believe would need to change to align with CAISO process, including any settlement implications that would result from these changes or limitations.</p> <p>Topic B: The CAISO-PacifiCorp specific planned treatment of existing OATT rights and obligations following PacifiCorp’s planned integration into a regional transmission organization.</p> <p>1. Are there any Transmission Access Charge (TAC) proposals that PacifiCorp would reject as non-viable or non-beneficial to PacifiCorp stakeholders? And, in the converse, what elements for TAC proposals does PacifiCorp consider most important?</p> <p>2. Will parties to ETCs be subject to any administrative or uplift charges assessed by the CAISO? It would be useful for PacifiCorp to provide detail regarding the extent to which parties under existing contracts will be subject to CAISO charges for congestion, losses or ancillary services.</p> <p>a. Could PacifiCorp (and CAISO) provide a relatively recent (i.e., post-FERC Order No. 888) step-by-step example of how CAISO has integrated a Transmission Owner with ETCs? It would be useful to understand examples of how ETCs were treated before and after the integration process.</p> <p>b. Do CAISO and PacifiCorp believe that CAISO’s treatment of ETCs in prior integration processes provides a complete template for PacifiCorp’s integration? If not, it would be helpful to outline additional or different considerations.</p> <p>c. It would be useful to understand the types of existing ETC rights that may prove problematic on PacifiCorp’s integration. Please provide examples of a transmissions service agreement provisions that must be modified in order to preserve other rights contained in the transmission service agreement,</p>

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	<p>while still permitting integration.</p> <p>3. Does PacifiCorp predict any differences in the way CAISO and PacifiCorp will work toward integration, based on the circumstances presented here, in which the PacifiCorp BAA presents a much larger and more diverse footprint than CAISO has considered before?</p>
<p>Scott Lynsky, UMPA</p>	<ol style="list-style-type: none"> 1. It is our understanding that the CAISO has placed the responsibility on PacifiCorp to meet with Transmission Customers and discuss/resolve the Legacy Agreement issue. How would the ISO Integration work with those transmission customers who's Legacy Agreements remain in place? 2. What are the requirements and procedures for a Participating TO and a Non-Participating TO if the integration were to occur? Take for example, the Bonanza – Mona 345 kV line? 3. Provide details on the Resource Adequacy requirements (i.e. how would it be implemented) and details on how the Transmission Access Charge will be calculated with emphasis on assigning costs to match the benefits. 4. A workshop on Congestion Revenue Rights will be very helpful and we are looking forward to it. Provide details on how the OATI NITS module will be used in the CRR calculations.