

April 24, 2025

RE: Powerex's comments on PacifiCorp's Draft CAISO Markets Business Practice

Powerex appreciates the opportunity to comment on PacifiCorp's DRAFT CAISO Markets Business Practice (Draft BP), which was published on March 24, 2025, and discussed at PacifiCorp's Transmission Customer Workshop that was held on March 31, 2025. Over the course of that meeting, PacifiCorp indicated that information for incomplete or blank sections of the Draft BP will be provided at a later date.

While several provisions in the Draft BP raise serious concerns, Powerex believes it is premature for PacifiCorp to be requesting detailed comments on the Draft BP. Various substantive sections of the Draft BP remain to be determined, which precludes the ability of stakeholders to fully evaluate the proposals and provide comprehensive comments at this time.

In addition, there is substantial opposition to PacifiCorp's EDAM OATT Tariff Amendments, which are currently in front of the Federal Energy Regulatory Commission (FERC). Powerex has filed both a Protest and an Answer in the FERC docket, highlighting Powerex's significant concerns with PacifiCorp's proposal, which Powerex believes will result in the proposed OATT amendments being ruled unjust and unreasonable. These concerns include:

- 1) Compelling all PacifiCorp transmission customers to participate in PacifiCorp's preferred market, making those customers captive to EDAM and exposing transmission customers to new congestion charges without an adequate hedge.
- 2) Failing to assign high priority to intra-day firm transmission schedules over EDAM transfers that are not scheduled using firm service.
- 3) Refusing to allow a limited carve-out of transmission rights to enable customers to use their rights in the regional programs and markets of their choosing, including Markets+.

As the Draft BP will ultimately rely on FERC-approved OATT amendments, it is unclear whether the tariff provisions that form the foundation for much of PacifiCorp's Draft BP will be appropriate. Indeed, it is reasonable to expect that PacifiCorp will need to re-evaluate and revise its business practices once FERC has issued its Order.

PacifiCorp indicated it plans to hold two additional workshops on May 15 and June 16, 2025, to discuss stakeholder comments on the Draft BP. Powerex strongly urges PacifiCorp to reconsider the current BP stakeholder engagement process and schedule to allow for further stakeholder engagement workshops and comment periods on the Draft BP once a FERC decision has been rendered.