



# Penalty Enhancements (PEDRIT) Initiative Idaho Power Comments

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# Idaho Power Case Study



## Background

- 19.5 MW resource was set up at EIM implementation
- Transmission line losses were accounted for twice in meter data reported to CAISO.
- Impacted trade dates: April 2018 – May 2022

## Action/Impact

- Meter Data was corrected and re-submitted for the period of October 2021 through May 2022 (256 business days allowed in Tariff).
- Error was small - an hourly average of 0.37 MWh or 2.65%.

## Penalty

- Assessed base penalty of \$639,000 for resubmitted trade dates
- Filed at FERC to waive the penalty
- Penalty waived by FERC

# Issues to Address

## Issue #1 –

Disproportionate penalty design: \$1,000 per trading day

- Solution addressed in the Rules of Conduct initiative

## Issue #2 –

Every error was a tariff violation subject to penalty regardless of magnitude of the error.

- No tolerance error band for small meter data inaccuracies, everything got a penalty.

# Idaho Power Perspective



Proposed solution addresses the remaining Issue #2



Proposal solves our initial issues, in particular disproportionately large penalties for small meter data errors

Proposal was developed through a thorough and collaborative stakeholder process.



CAISO staff listened to stakeholders' concerns and suggestions.

# Support Proposal



Idaho Power supports this proposal and thanks CAISO's staff for the work done.