

## Deseret Power Electric Cooperative Comments on Proposed Transition Period Proposal

Clay MacArthur, 801-619-6536, cmacarthur@deseretpower.com

Tekoi Dent, 801-619-6546, tdent@deseretpower.com

Deseret is a transmission service customer of PacifiCorp. PacifiCorp, in its PacifiCorp East (“PACE”) balancing authority area (“BAA”), serves as the host balancing authority (“BA”) for Deseret’s transmission system and for the 458-MW generating unit (non-participating) which, as the majority owner, Deseret operates. Deseret serves load through requirements contracts and makes third party sales within PACE. Deseret offers the following comments on the CAISO’s Draft Final Proposal EIM Year 1 Enhancements Phase 2 dated September 8, 2015.

1. Deseret strongly supports the idea of standard base schedule treatments of e-Tags amongst EIM entities. As discussed, the import of one EIM Entity could become the export for another EIM Entity. If each EIM entity, at its discretion, develop various standards for including or excluding e-Tags, entities transacting in those BAA’s could become subject to artificial energy imbalance. Therefore, Deseret agrees with the ISO’s proposed harmonization of approved, pending and adjusted e-Tags as a valid means to communicate an import/export base schedule to an EIM entity. In addition, the harmonization of Base Schedule and FMM submittal timelines should also be considered as they could also subject entities transacting across EIM Entity boundaries to artificial energy imbalance.