

March 8, 2013

## **Public Utility Commission**

550 Capitol Street NE, Suite 215
Mailing Address: PO Box 2148
Salem, OR 97308-2148
Consumer Services
1-800-522-2404
Local: 503-378-6600
Administrative Services
503-373-7394

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Board of Governors California Independent System Operator 250 Outcropping Way Folsom, CA 95630

Dear Board of Governors,

We urge you to authorize the California ISO to proceed with its implementation agreement with PacifiCorp for a two-party energy imbalance market.

We regulate PacifiCorp's operations in Oregon. PacifiCorp serves nearly 560,000 Oregon households and businesses. We have been involved in and tracking efforts by Western Commissioners to explore the concept of a voluntary Western energy imbalance market (EIM) as a way to lower overall system costs and enhance reliability as we integrate more variable generation into the grid.

We are encouraged by the decision of the ISO and PacifiCorp to pursue a partnership. We see this as a pivotal development that could spur more coordination and more effective grid management across the entire region to the benefit of all ratepayers.

We await the additional details about the projected costs and benefits of the EIM and how it will be implemented. At the same time, we can see potentially great benefits to the parties moving forward to negotiate a full agreement and meet their goal of launching an EIM in 2014.

We are pleased to see that the parties have contemplated voluntary market participation that maintains the responsibility of each utility to meet its own capacity needs. This is a positive step that can deliver benefits for customers quickly and avoids the complications that have previously prevented the formation of coordinated markets in the West.

In addition, if successful, we are encouraged by the prospect of greater benefits in future years with participation from other Western Interconnection organizations.

We applaud the ISO and PacifiCorp for demonstrating leadership on this issue and we encourage the Board to authorize the agreement moving forward.

Sincerely,

Susan Ackerman

Chair

Jøhn Savage Commissioner Števe Bloom Commissioner