

**Questions and Comments  
Of  
Utah Associated Municipal Power Systems  
on the  
Energy Imbalance Market 3<sup>rd</sup> Revised Straw Proposal**

1. The Proposal states that CAISO will not implement Order 764 until Spring 2014. When will PacifiCorp implement?
2. The EIM will financially settle based on EIM schedules compared with base schedules not on actual metered load and resource balance. Is this true and does this preclude an entity from managing its own load/resource balance in real time?
3. In the “local market power mitigation process”, what are the “uncompetitive conditions” that the process will test for?
4. In the 15-minute market: (1) what is meant by “producing generation schedules”? (2) Is PacifiCorp as the EIM Entity going to allow for the 15-minute market to “start-up and shutdown generators”? (3) Is PacifiCorp going to allow 15-minute energy bids at the interties as part of EIM?
5. The Proposal states that CAISO “will only allow market participants to update 15-minute generation and intertie schedules for physical reasons.” Who are “market participants? Does this apply to entities in PACE? How does this fit with Order 764?
6. In the 5-minute market, does the phrase “dispatch instructions for generators” only apply to EIM participating generators?
7. Under Settlement, (1) Why is generation and load settled separately and with different calculations? (2) What does settlement between base schedules and 15-minute schedules settling at 15-minute LMP’s have to do with Energy Imbalance? (3) The Proposal applies to settlement with the EIM Entity. Is there a proposal on how it will be handled within an EIM Entity?
8. The Proposal states that settlement will use neutrality accounts and that they will be allocated consistent with guidelines that CAISO developed in 2012. What are they and is their application to this process valid?
9. What does the “BAA Real-Time Congestion Balancing Account” have to do with EIM?
10. How will PacifiCorp handle the “bid cost recovery account”?
11. What is the “cost of greenhouse gas compliance obligation”?
12. Transmission used by the EIM should be paid for to avoid subsidizing the process.
13. If Order 764 will result in financially binding 15-minute energy schedules, why are base scheduled restricted to hourly granularity.
14. The Straw Proposal shows a timeline for “Activities Prior to Operating Hour” for the EIM Entity SC and EIM Participating Resource SC. What is the proposed timeline for other scheduling entities?

15. Under Local Market Power Mitigation section, the “tests” for market power seem to be based on a flow-based structure and effects on constraints rather than contract path structure that is used in PacifiCorp. How will Local Market Power Mitigation work in PacifiCorp? Is the number of sellers to the EIM one of the criteria that will be looked at? How can “resource bids and import or export bids for scheduling limit constraints” be “deemed competitive by definition”?
16. What or where will the Load Aggregation Points be in the Pace BA?