

WESTERN EIM BENEFITS REPORT

Fourth Quarter 2019

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EXECUTIVE SUMMARY

Gross benefits from EIM since November 2014

\$861.79 million

This report presents the benefits associated with participation in the Western Energy Imbalance Market (EIM) for the Fourth Quarter of 2019. The benefits include cost savings and the use of surplus renewable energy.

The Western EIM is helping to displace lessclean energy supplies with surplus renewable energy that otherwise may have been curtailed.

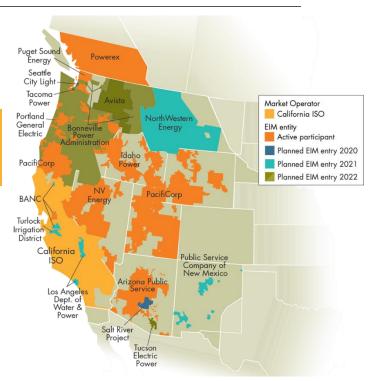
This analysis demonstrates the benefit of economic dispatch in the real time market across a larger EIM footprint with more diverse resources and geography.

Q4 2019 Gross Benefits by Participant

| | (millions \$) |
|---------------------------|---------------|
| Arizona Public Service | \$17.37 |
| BANC | \$2.68 |
| California ISO | \$2.36 |
| Idaho Power | \$6.09 |
| NV Energy | \$6.62 |
| PacifiCorp | \$11.32 |
| Portland General Electric | \$10.76 |
| Powerex | \$0.61 |
| Puget Sound Energy | \$2.91 |
| Total | \$60.72 |

*EIM Quarterly Benefit Report Methodology, https://www.caiso.com/Documents/EIM_BenefitMethodology.pdf

 ${\color{blue} \underline{http://www.caiso.com/Documents/GreenhouseGasEmissionsTrackingReport-FrequentlyAskedQuestions.pdf} }$



2019 Q4 BENEFITS

ECONOMICAL

\$60.72M

Gross benefits realized due to more efficient inter-and intraregional dispatch in the Fifteen-Minute Market (FMM) and Real-Time Dispatch (RTD)*

ENVIRONMENTAL

15,089

Metric tons of CO₂** avoided curtailments

OPERATIONAL

46%

Average reduction in flexibility reserves across the footprint

^{**}The GHG emission reduction reported is associated with the avoided curtailment only. The current market process and counterfactual methodology cannot differentiate the GHG emissions resulting from serving ISO load via the EIM versus dispatch that would have occurred external to the ISO without the EIM. For more details, see

BACKGROUND

The Western EIM began financially binding operation on November 1, 2014 by optimizing resources across the ISO and PacifiCorp Balancing Authority Areas (BAAs). NV Energy began participating in December 2015, Arizona Public Service and Puget Sound Energy began participating in October 2016, and Portland General Electric began participating in October 2017. Idaho Power and Powerex began participating on April 4, 2018. Most recently, the Balancing Authority of Northern California (BANC)¹, began participating on April 3, 2019. The EIM footprint now includes portions of Arizona, California, Idaho, Nevada, Oregon, Utah, Washington, Wyoming, and extends to the border with Canada.

The ISO began publishing quarterly EIM benefit reports in April 2015. Prior reports can be accessed at https://www.westerneim.com/Pages/About/QuarterlyBenefits.aspx.

■ WESTERN EIM ECONOMIC BENEFITS IN Q4 2019

Table 1 shows the estimated EIM gross benefits by each region per month². The monthly savings presented show \$21.26 million for October, \$21.18 million for November, and \$18.28 million for December with a total estimated benefit of \$60.72 million for the quarter.

| Region | October | November | December | Total |
|--------|---------|----------|----------|---------|
| APS | \$6.72 | \$4.98 | \$5.67 | \$17.37 |
| BANC | \$1.23 | \$1.12 | \$0.33 | \$2.68 |
| CISO | \$1.09 | \$0.89 | \$0.38 | \$2.36 |
| IPCO | \$2.47 | \$1.74 | \$1.88 | \$6.09 |
| NVE | \$2.47 | \$2.63 | \$1.52 | \$6.62 |
| PAC | \$3.05 | \$4.64 | \$3.63 | \$11.32 |
| PGE | \$3.30 | \$3.84 | \$3.62 | \$10.76 |
| PWRX | \$0.15 | \$0.25 | \$0.21 | \$0.61 |
| PSE | \$0.78 | \$1.09 | \$1.04 | \$2.91 |
| Total | \$21.26 | \$21.18 | \$18.28 | \$60.72 |

TABLE 1: Fourth Quarter 2019 benefits in millions USD by month

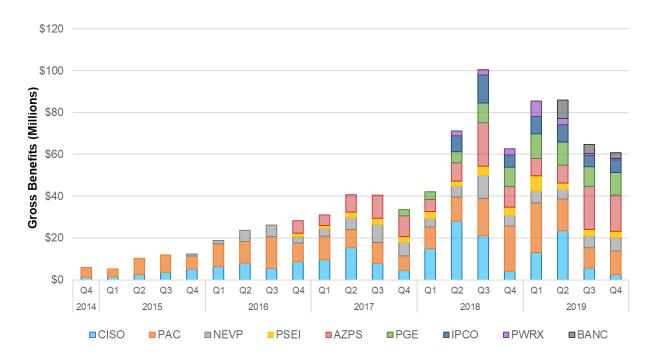
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¹ The benefits reflect the Sacramento Municipal Utility District as the participating resource within BANC.

² The EIM benefits reported here are calculated based on available data. Intervals without complete data are excluded in the calculation. The intervals excluded due to unavailable data are normally within a few percent of the total intervals.

CUMULATIVE EIM BENEFITS SINCE INCEPTION

Since the start of the EIM in November 2014, the cumulative economic benefits have totaled \$861.79 million. The quarterly benefits have grown over time as a result of the participation of new Balancing Authority Areas (BAA) in the market, which results in additional benefits for both the individual BAA but also compounds the benefits to adjacent BAA's by enabling further transfers. Graph 1 illustrates the gross economic benefits of the EIM by quarter for each participating BAA.



GRAPH 1: Cumulative gross benefits since the inception of the EIM

INTER-REGIONAL TRANSFERS

A significant contributor to EIM benefits is transfers across balancing areas, providing access to lower cost supply, while factoring in the cost of compliance with greenhouse gas (GHG) emissions regulations when energy is transferred into the ISO. As such, the transfer volumes are a good indicator of a portion of the benefits attributed to the EIM. Transfers can take place in both the 15-Minute Market and Real-Time Dispatch (RTD).

Generally, transfer limits are based on transmission and interchange rights that participating balancing authority areas make available to the EIM, with the exception of the PacifiCorp West (PACW)-ISO transfer limit and the Portland General Electric (PGE)-ISO transfer limit in RTD. These RTD transfer capacities between PACW/PGE and the ISO are determined based on the allocated dynamic transfer capability driven by system operating conditions. This report does not quantify a BAA's opportunity cost that the utility considered when using its transfer rights for the EIM.

Table 2 provides the 15-minute and 5-minute EIM transfer volumes with base schedule transfers excluded. The EIM entities submit inter-BAA transfers in their base schedules. The benefits quantified in this report are only attributable to the transfers that occurred through the EIM. The benefits do not include any transfers attributed to transfers submitted in the base schedules that are scheduled prior to the start of the EIM.

The transfer from BAA_x to BAA_y and the transfer from BAA_y to BAA_x are separately reported. For example, if there is a 100 Megawatt-Hour (MWh) transfer during a 5-minute interval, in addition to a base transfer from ISO to NVE, it will be reported as 100 MWh from_BAA ISO to_BAA NEVP, and 0 MWh from_BAA NEVP to_BAA ISO in the opposite direction. The 15-minute transfer volume is the result of optimization in the 15-minute market using all bids and base schedules submitted into the EIM. The 5-minute transfer volume is the result of optimization using all bids and base schedules submitted into EIM, based on unit commitments determined in the 15-minute market optimization. The maximum transfer capacities between EIM entities are shown in Graph 2 below.

| Month | From BAA | To BAA | 15min EIM transfer | 5min EIM transfer |
|-------|----------|--------|-----------------------|----------------------|
| | | • | (15m - base) | (5m - base) |
| | AZPS | CISO | 338,465 | 300,949 |
| | AZPS | NEVP | 11,727 | 14,266 |
| | AZPS | PACE | 22,330 | 22,309 |
| | BANC | CISO | 40,368 | 29,354 |
| | PWRX | CISO | 0 | 0 |
| | PWRX | PSEI | 15,776 | 17,742 |
| | CISO | AZPS | 13,407 | 17,763 |
| | CISO | BANC | 69,752 | 85,942 |
| | CISO | PWRX | 53,766 | 68,062 |
| | CISO | NEVP | 26,293 | 30,992 |
| | CISO | PACW | 52,232 | 73,166 |
| | CISO | PGE | 54,979 | 82,171 |
| | IPCO | NEVP | 42,462 | 28,519 |
| | IPCO | PACE | 4,481 | 2,991 |
| | IPCO | PACW | 49,171 | 52,037 |
| | IPCO | PSEI | 11,748 | 13,173 |
| | NEVP | AZPS | 4,339 | 2,546 |

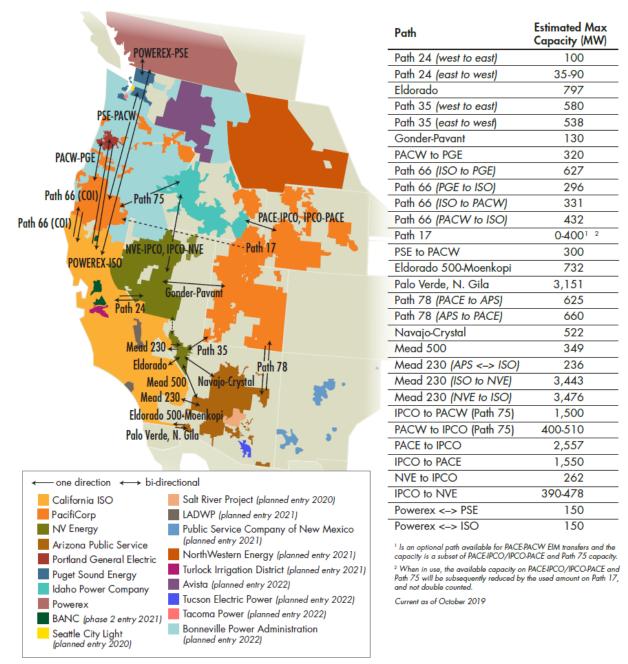
| ī | | | | |
|---------|------|------|---------|---------|
| | NEVP | CISO | 159,172 | 123,909 |
| | NEVP | IPCO | 26,449 | 25,096 |
| October | NEVP | PACE | 46,529 | 49,675 |
| | PACE | AZPS | 107,555 | 89,141 |
| | PACE | IPCO | 108,574 | 122,682 |
| | PACE | NEVP | 66,427 | 60,490 |
| | PACE | PACW | 43,547 | 50,397 |
| | PACW | CISO | 19 | 2,538 |
| | PACW | IPCO | 31,367 | 24,682 |
| | PACW | PGE | 61,944 | 55,164 |
| | PACW | PSEI | 51,127 | 53,304 |
| | PGE | CISO | 3,262 | 2,812 |
| | PGE | PACW | 28,364 | 34,748 |
| | PGE | PSEI | 641 | 760 |
| | PSEI | PWRX | 34,004 | 38,577 |
| | PSEI | IPCO | 3,603 | 2,795 |
| | PSEI | PACW | 16,152 | 17,572 |
| | PSEI | PGE | 316 | 336 |
| | AZPS | CISO | 170,089 | 146,335 |
| | AZPS | NEVP | 5,150 | 9,729 |
| | AZPS | PACE | 4,184 | 5,225 |
| | BANC | CISO | 28,561 | 21,568 |
| | PWRX | CISO | 0 | 0 |
| | PWRX | PSEI | 21,670 | 21,423 |
| | CISO | AZPS | 21,759 | 25,854 |
| | CISO | BANC | 49,868 | 62,514 |
| | CISO | PWRX | 22,792 | 34,233 |
| | CISO | NEVP | 17,512 | 31,175 |
| | CISO | PACW | 17,338 | 29,267 |
| | CISO | PGE | 24,934 | 39,601 |
| 1 | | 1 | | |

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| I | IDOO | NEV/D | 40.000 | 40.400 |
|----------|------|-------|----------|---------|
| | IPCO | NEVP | 43,233 | 19,439 |
| | IPCO | PACE | 8,061 | 2,492 |
| November | IPCO | PACW | 25,069 | 34,235 |
| | IPCO | PESI | 205 | 306 |
| | NEVP | AZPS | 10,146 | 7,042 |
| | NEVP | CISO | 158,943 | 92,841 |
| | NEVP | IPCO | 24,472 | 29,309 |
| | NEVP | PACE | 28,984 | 34,260 |
| | PACE | AZPS | 121,074 | 90,011 |
| | PACE | IPCO | 66,192 | 95,610 |
| | PACE | NEVP | 88,079 | 66,881 |
| | PACE | PACW | 10,638 | 17,129 |
| | PACW | CISO | 21,528 | 44,847 |
| | PACW | IPCO | 37,768 | 26,707 |
| | PACW | PGE | 67,453 | 65,517 |
| | PACW | PSEI | 22,607 | 22,565 |
| | PGE | CISO | 5,333 | 5,078 |
| | PGE | PACW | 17,118 | 18,725 |
| | PGE | PSEI | 1,042 | 1,042 |
| | PSEI | PWRX | 28,157 | 30,419 |
| | PSEI | IPCO | 142 | 159 |
| | PSEI | PACW | 39,609 | 44,176 |
| | PSEI | PGE | 3,472 | 3,770 |
| | AZPS | CISO | 189,304 | 158,269 |
| | AZPS | NEVP | 7,394 | 13,123 |
| | AZPS | PACE | 11,571 | 16,493 |
| | BANC | CISO | 12,999 | 11,588 |
| | PWRX | CISO | 0 | 0 |
| | PWRX | PSEI | 17,365 | 15,736 |
| | CISO | AZPS | 24,355 | 37,395 |
| I | | 1 | <u> </u> | |

| CISO PWRX 25,550 39,767 CISO NEVP 34,629 53,473 CISO PACW 17,115 30,196 CISO PGE 22,812 42,681 IPCO NEVP 64,082 32,804 IPCO PACE 22,565 9,512 IPCO PACW 23,004 32,697 IPCO PSEI 31 28 NEVP AZPS 12,467 11,469 NEVP CISO 127,330 67,351 NEVP IPCO 26,448 33,904 NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 PSEI PGE 3,118 3,281 | | CISO | BANC | 70,648 | 80,427 |
|---|----------|------|------|---------|---------|
| CISO NEVP 34,629 53,473 CISO PACW 17,115 30,196 CISO PGE 22,812 42,681 IPCO NEVP 64,082 32,804 IPCO PACE 22,565 9,512 IPCO PACW 23,004 32,697 IPCO PSEI 31 28 NEVP AZPS 12,467 11,469 NEVP CISO 127,330 67,351 NEVP IPCO 26,448 33,904 NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW CISO 36,551 63,404 PACW PGE 74,486 72,685 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 17,017 | | CISO | PWRX | | |
| CISO PACW 17,115 30,196 CISO PGE 22,812 42,681 IPCO NEVP 64,082 32,804 IPCO PACE 22,565 9,512 IPCO PACW 23,004 32,697 IPCO PSEI 31 28 December NEVP AZPS 12,467 11,469 NEVP CISO 127,330 67,351 NEVP IPCO 26,448 33,904 NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW CISO 36,551 63,404 PACW PGE 74,486 72,685 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 0 PSEI PACW 42,893 47,617 | | | | | |
| CISO PGE 22,812 42,681 IPCO NEVP 64,082 32,804 IPCO PACE 22,565 9,512 IPCO PACW 23,004 32,697 IPCO PSEI 31 28 NEVP AZPS 12,467 11,469 NEVP CISO 127,330 67,351 NEVP IPCO 26,448 33,904 NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 0 PSEI PACW 42,893 47,617 | | | | | |
| IPCO NEVP 64,082 32,804 IPCO PACE 22,565 9,512 IPCO PACW 23,004 32,697 IPCO PSEI 31 28 IPCO PSEI 31 28 NEVP AZPS 12,467 11,469 NEVP CISO 127,330 67,351 NEVP IPCO 26,448 33,904 NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | CISO | PACW | 17,115 | 30,196 |
| IPCO | | CISO | PGE | 22,812 | 42,681 |
| IPCO | | IPCO | NEVP | 64,082 | 32,804 |
| IPCO | | IPCO | PACE | 22,565 | 9,512 |
| December NEVP AZPS 12,467 11,469 NEVP CISO 127,330 67,351 NEVP IPCO 26,448 33,904 NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | IPCO | PACW | 23,004 | 32,697 |
| NEVP CISO 127,330 67,351 NEVP IPCO 26,448 33,904 NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | IPCO | PSEI | 31 | 28 |
| NEVP IPCO 26,448 33,904 NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | December | NEVP | AZPS | 12,467 | 11,469 |
| NEVP PACE 45,676 52,564 PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | NEVP | CISO | 127,330 | 67,351 |
| PACE AZPS 133,207 107,352 PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | NEVP | IPCO | 26,448 | 33,904 |
| PACE IPCO 51,608 68,680 PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | NEVP | PACE | 45,676 | 52,564 |
| PACE NEVP 54,606 39,802 PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PACE | AZPS | 133,207 | 107,352 |
| PACE PACW 16,011 22,646 PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PACE | IPCO | 51,608 | 68,680 |
| PACW CISO 36,551 63,404 PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PACE | NEVP | 54,606 | 39,802 |
| PACW IPCO 54,722 37,853 PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PACE | PACW | 16,011 | 22,646 |
| PACW PGE 74,486 72,685 PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PACW | CISO | 36,551 | 63,404 |
| PACW PSEI 25,909 28,138 PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PACW | IPCO | 54,722 | 37,853 |
| PGE CISO 25,554 24,562 PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PACW | PGE | 74,486 | 72,685 |
| PGE PACW 10,903 15,026 PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PACW | PSEI | 25,909 | 28,138 |
| PGE PSEI 1,411 1,770 PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PGE | CISO | 25,554 | 24,562 |
| PSEI PWRX 33,655 36,337 PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PGE | PACW | 10,903 | 15,026 |
| PSEI IPCO 0 0 PSEI PACW 42,893 47,617 | | PGE | PSEI | 1,411 | 1,770 |
| PSEI PACW 42,893 47,617 | | PSEI | PWRX | 33,655 | 36,337 |
| | | PSEI | IPCO | 0 | 0 |
| PSEI PGE 3,118 3,281 | | PSEI | PACW | 42,893 | 47,617 |
| | | PSEI | PGE | 3,118 | 3,281 |

TABLE 2: Energy transfers (MWh) in the FMM and RTD markets for Q4 2019



GRAPH 2: Estimated maximum transfer capacity (EIM entities operating in Q4 2019)

WHEEL THROUGH TRANSFERS

As the footprint of the Western EIM grows and continues to change, wheel-through transfers may become more common. Currently, an EIM entity facilitating a wheel through receives no direct financial benefit for facilitating the wheel; only the sink and source directly benefit. As part of the Western EIM Consolidated Initiatives stakeholder process, the ISO committed to monitoring the wheel through volumes to assess whether, after the addition of new EIM entities, there is a potential future need to pursue a market solution to address the equitable sharing of wheeling benefits. The ISO will continue to track the volume of wheel-through transfers in the EIM market in the quarterly reports. In order to derive the wheel-through transfers for each EIM BAA, the ISO uses the following calculation for every real-time interval dispatch:

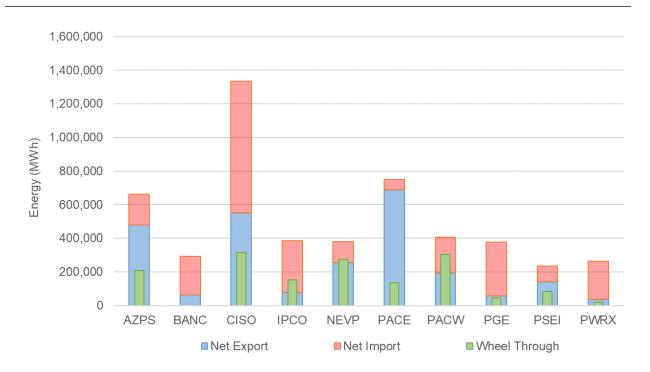
- Total import: summation of transfers above base transfers coming into the EIM BAA under analysis
- Total export: summation of all transfers above base transfers going out of the EIM BAA under analysis
- Net import: the maximum of zero or the difference between total imports and total exports
- Net export: the maximum of zero or the difference between total exports and total imports
- Wheel through: the minimum of the EIM transfers into (total import) or EIM transfer out (total export) of a BAA for a given interval

All wheel-through transfers are summed over both the month and the quarter. This volume reflects the total wheel-through transfers for each EIM BAA, regardless of the potential paths used to wheel through. The net imports and exports estimated in this section reflect the overall volume of net imports and exports; in contrast, the imports and exports provided in Table 2 reflect the gross transfers between two EIM BAAs.

The metric is measured as energy in MWh for each month and the corresponding calendar quarter, as shown in Tables 3 through 6 and Graphs 3 through 6.

| BAA | Net Export | Net Import | Wheel Through |
|------|------------|------------|---------------|
| AZPS | 479,837 | 182,083 | 207,189 |
| BANC | 62,585 | 229,577 | - |
| CISO | 551,855 | 781,781 | 314,935 |
| IPCO | 76,690 | 310,181 | 151,938 |
| NEVP | 255,003 | 124,640 | 275,689 |
| PACE | 688,208 | 60,370 | 135,262 |
| PACW | 194,144 | 213,094 | 303,638 |
| PGE | 57,996 | 319,543 | 46,331 |
| PSEI | 141,074 | 93,407 | 82,627 |
| PWRX | 36,075 | 228,792 | 18,729 |

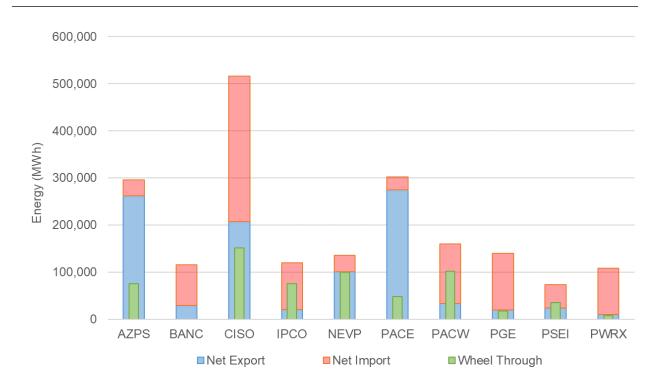
TABLE 3: Estimated wheel-through transfers in Q4 2019



GRAPH 3: Estimated wheel-through transfers in Q4 2019

| BAA | Net Export | Net Import | Wheel-Through |
|------|------------|------------|---------------|
| AZPS | 262,038 | 33,897 | 75,698 |
| BANC | 29,356 | 86,364 | - |
| CISO | 207,496 | 308,071 | 151,804 |
| IPCO | 20,905 | 99,469 | 76,049 |
| NEVP | 101,214 | 34,329 | 100,249 |
| PACE | 275,113 | 26,985 | 48,075 |
| PACW | 33,847 | 126,490 | 102,114 |
| PGE | 20,186 | 119,835 | 18,215 |
| PSEI | 23,989 | 49,727 | 35,398 |
| PWRX | 9,870 | 98,846 | 7,935 |

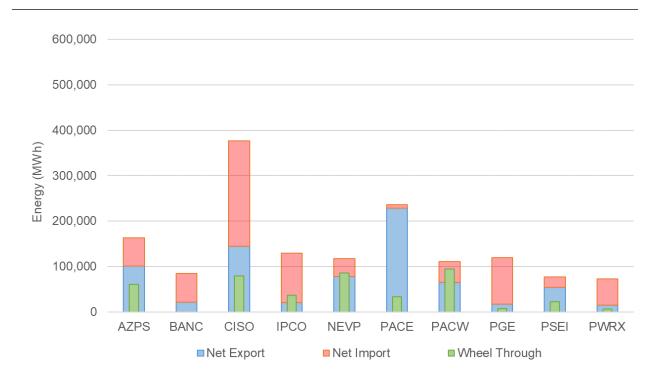
TABLE 4: Estimated wheel-through transfers in October 2019



GRAPH 4: Estimated wheel-through transfers in October 2019

| BAA | Net Export | Net Import | Wheel- Through |
|------|------------|------------|----------------|
| AZPS | 100,677 | 62,648 | 60,372 |
| BANC | 21,626 | 62,645 | - |
| CISO | 144,233 | 232,150 | 78,894 |
| IPCO | 19,852 | 109,197 | 36,692 |
| NEVP | 77,589 | 40,243 | 86,104 |
| PACE | 228,027 | 8,601 | 33,253 |
| PACW | 65,164 | 45,514 | 94,169 |
| PGE | 17,575 | 102,249 | 6,793 |
| PSEI | 54,331 | 22,615 | 22,573 |
| PWRX | 14,607 | 57,819 | 6,654 |

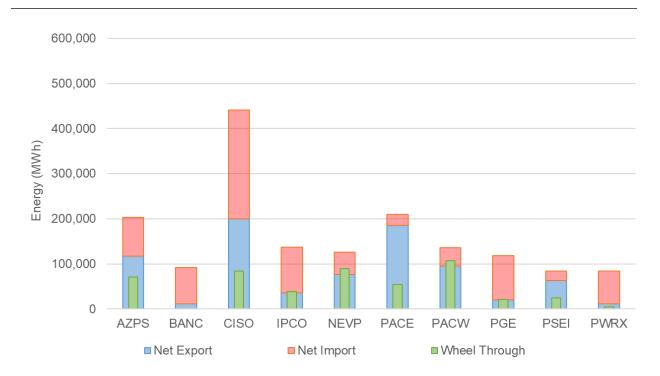
TABLE 5: Estimated wheel-through transfers in November 2019



GRAPH 5: Estimated wheel-through transfers in November 2019

| BAA | Net Export | Net Import | Wheel Through |
|------|------------|------------|---------------|
| AZPS | 117,123 | 85,538 | 71,119 |
| BANC | 11,603 | 80,568 | - |
| CISO | 200,126 | 241,559 | 84,238 |
| IPCO | 35,933 | 101,515 | 39,196 |
| NEVP | 76,200 | 50,069 | 89,337 |
| PACE | 185,068 | 24,784 | 53,935 |
| PACW | 95,133 | 41,090 | 107,354 |
| PGE | 20,235 | 97,460 | 21,323 |
| PSEI | 62,754 | 21,064 | 24,656 |
| PWRX | 11,597 | 72,127 | 4,140 |

TABLE 6: Estimated wheel-through transfers in December 2019



GRAPH 6: Estimated wheel-through transfers in December 2019

REDUCED RENEWABLE CURTAILMENT AND GHG REDUCTIONS

The Western EIM benefit calculation includes the economic benefits that can be attributed to avoided renewable curtailment within the ISO footprint. If not for energy transfers facilitated by the EIM, some renewable generation located within the ISO would have been curtailed via either economic or exceptional dispatch. The total avoided renewable curtailment volume in MWh for Q4 2019 was calculated to be 15,286 MWh (October) + 11,405 MWh (November) + 8,563 MWh (December) = 35,254 MWh total.

The environmental benefits of avoided renewable curtailment are significant. Under the assumption that avoided renewable curtailments displace production from other resources at a default emission rate of 0.428 metric tons CO_2/MWh , avoided curtailments displaced an estimated 15,089 metric tons of CO_2 for Q4 2019. Avoided renewable curtailments also may have contributed to an increased volume of renewable credits that would otherwise have been unavailable. This report does not quantify the additional value in dollars associated with this benefit. Total estimated reductions in the curtailment of renewable energy along with the associated reductions in CO_2 are shown in Table 7.

| Year | Quarter | MWh | Eq. Tons CO2 |
|------|---------|--------|--------------|
| | 1 | 8,860 | 3,792 |
| 2015 | 2 | 3,629 | 1,553 |
| | 3 | 828 | 354 |
| | 4 | 17,765 | 7,521 |

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| | 1 | 112,948 | 48,342 |
|------|-------|-----------|---------|
| | 2 | 158,806 | 67,969 |
| 2016 | 3 | 33,094 | 14,164 |
| | 4 | 23,390 | 10,011 |
| | 1 | 52,651 | 22,535 |
| 2017 | 2 | 67,055 | 28,700 |
| | 3 | 23,331 | 9,986 |
| | 4 | 18,060 | 7,730 |
| | 1 | 65,860 | 28,188 |
| 2018 | 2 | 129,128 | 55,267 |
| | 3 | 19,032 | 8,146 |
| | 4 | 23,425 | 10,026 |
| | 1 | 52,254 | 22,365 |
| 2019 | 2 | 132,937 | 56,897 |
| | 3 | 33,843 | 14,485 |
| | 4 | 35,254 | 15,089 |
| | Total | 1,012,150 | 433,120 |

TABLE 7: Total reduction in curtailment of renewable energy and the associated reductions in CO₂

■ FLEXIBLE RAMPING PROCUREMENT DIVERSITY SAVINGS

The Western EIM facilitates procurement of flexible ramping capacity in the FMM to address variability that may occur in the RTD. Because variability across different BAAs may happen in opposite directions, the flexible ramping requirement for the entire EIM footprint can be less than the sum of individual BAA's requirements. This difference is known as flexible ramping procurement diversity savings. Starting in 2016, the ISO replaced the flexible ramping constraint with flexible ramping products that provide both upward and downward ramping. The minimum and maximum flexible ramping requirements for each BAA and for each direction are listed in Table 8.

| Month | ВАА | Direction | Minimum requirement | Maximum requirement | |
|----------|---------|-----------|---------------------|---------------------|--|
| | AZPS | up | 25 | 263 | |
| | BANC | up | 4 | 66 | |
| | CISO | up | 316 | 1592 | |
| | IPCO | up | 43 | 229 | |
| | NEVP | up | 23 | 279 | |
| | PACE | up | 73 | 313 | |
| | PACW | up | 44 | 194 | |
| | PGE | up | 56 | 213 | |
| October | PSEI | up | 29 | 169 | |
| | PWRX | up | 60 | 231 | |
| | ALL EIM | up | 332 | 1,620 | |
| | AZPS | down | 33 | 370 | |
| | BANC | down | 59 | 71 | |
| | CISO | down | 123 | 1,305 | |
| | IPCO | down 54 | | 232 | |
| | NEVP | down | 27 | 268 | |
| | PACE | down | 94 | 328 | |
| | PACW | down | 25 | 128 | |
| | PGE | down | 39 | 242 | |
| | PSEI | down | 30 | 205 | |
| | PWRX | down | 59 | 270 | |
| | ALL EIM | down | 193 | 1,521 | |
| | AZPS | up | 0 | 321 | |
| | BANC | up | 0 | 58 | |
| | CISO | up | 0 | 1,556 | |
| | IPCO | up | 0 | 229 | |
| | NEVP | up | 0 | 272 | |
| November | PACE | up | 0 | 321 | |

| | PACW | up | 0 | 194 | | |
|----------|--------------|------|-----|-------|--|--|
| | PGE | up | 0 | 213 | | |
| | PSEI | up | 0 | 169 | | |
| | PWRX | up | 0 | 231 | | |
| | ALL EIM | up | 0 | 1,867 | | |
| | AZPS | down | 0 | 370 | | |
| | BANC | down | 0 | 68 | | |
| | CISO | down | 0 | 1,399 | | |
| | IPCO | down | 0 | 228 | | |
| | NEVP | down | 0 | 226 | | |
| | PACE | down | 0 | 316 | | |
| | PACW | down | 0 | 154 | | |
| | PGE | down | 0 | 242 | | |
| | PSEI | down | 0 | 205 | | |
| | PWRX | down | 0 | 270 | | |
| | ALL EIM | down | 0 | 1,717 | | |
| | AZPS | up | 7 | 210 | | |
| | BANC | up | 3 | 58 | | |
| | CISO | up | 139 | 1,716 | | |
| | IPCO | up | 33 | 229 | | |
| | NEVP | up | 14 | 291 | | |
| | PACE | up | 53 | 321 | | |
| _ , | PACW | up | 45 | 194 | | |
| December | PGE | up | 38 | 206 | | |
| | PSEI | up | 33 | 156 | | |
| | PWRX | up | 61 | 230 | | |
| | ALL EIM | up | 196 | 1,905 | | |
| | | | 31 | 275 | | |
| | AZPS | down | 31 | 2.0 | | |
| | AZPS BANC | down | 5 | 72 | | |

| IPCO | down | 55 | 228 |
|---------|------|-----|-------|
| NEVP | down | 18 | 248 |
| PACE | down | 80 | 248 |
| PACW | down | 14 | 146 |
| PGE | down | 36 | 242 |
| PSEI | down | 52 | 143 |
| PWRX | down | 62 | 270 |
| ALL EIM | down | 299 | 1,740 |

Table 8: Flexible ramping requirements

The flexible ramping procurement diversity savings for all the intervals averaged over the month are shown in Table 9. The percentage savings is the average MW savings divided by the sum of the four individual BAA requirements.

| | October | | November | | December | |
|-------------------------|---------|-------|----------|-------|----------|-------|
| Direction | Up | Down | Up | Down | Up | Down |
| Average MW saving | 808 | 813 | 770 | 772 | 686 | 735 |
| Sum of BAA requirements | 1,712 | 1,663 | 1,615 | 1,670 | 1,576 | 1,681 |
| Percentage savings | 47% | 49% | 48% | 46% | 44% | 44% |

Table 9: Flexible ramping procurement diversity savings in Q4 2019

Flexible ramping capacity may be used in RTD to handle uncertainties in the future interval. The RTD flexible ramping capacity is prorated to each BAA. Flexible ramping surplus MW is defined as the awarded flexible ramping capacity in RTD minus its share, and the flexible ramping surplus cost is defined as the flexible ramping surplus MW multiplied by the flexible ramping EIM-wide marginal price. A positive flexible ramping surplus MW is the capacity that a BAA provided to help other BAAs, and a negative flexible ramping surplus MW is the capacity that a BAA received from other BAAs. The EIM dispatch cost for a BAA with positive flexible ramping surplus MW is increased because some capacities are used to help other BAAs. The flexible ramping surplus cost is subtracted from the BAA's EIM dispatch cost to reflect the true dispatch cost of a BAA. Please see the Benefit Report Methodology for more details.

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CONCLUSION

The first real-time wholesale power market of its kind in the western United States, the Western EIM uses state-of-the-art technology to find and deliver low-cost energy to meet real-time demand across eight western states and extends to the border with Canada. The Western EIM has proven extensive financial and operational benefits since its inception in November 2014, and cumulative gross economic benefits now total \$861.79 million.

Additionally, the EIM proves the cooperative efforts of participants provided significant environmental benefits through the reduction of renewable curtailments during periods of oversupply. Sharing resources across a larger geographic area reduces greenhouse gas emissions by using renewable generation that otherwise would have been turned off.

The quantified environmental benefits from avoided curtailments of renewable generation from 2015 to-date reached 433,120 metric tons of CO2, roughly the equivalent of avoiding the emissions from 91,062 passenger cars driven for one year.

Nine entities are currently participating in the EIM, and eleven more are committed to joining by 2022. As new entities join, the quarterly benefits are anticipated to grow from the resulting individual benefits and the compounded benefits across the footprint as transfers are enabled. The Western EIM demonstrates that utilities can realize cost benefits and reduce carbon emissions through increased coordination and optimization in the West.