

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**PacifiCorp**

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**Docket No. ER21-\_\_-000**

**REQUEST OF PACIFICORP FOR LIMITED WAIVER OF TARIFF, SHORTENED  
COMMENT PERIOD AND EXPEDITED ACTION**

Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. § 385.207(a)(5) (2021), PacifiCorp respectfully requests a waiver from the Commission to delay the effectiveness of certain limited revisions to Attachment U of its Open Access Transmission Tariff (“OATT”) that will otherwise become effective on October 1, 2021. If granted, the waiver would permit an additional five-month extension such that the revisions to Attachment U would become effective on March 1, 2022. The Commission grants waivers of tariff provisions where “(1) the applicant acted in good faith; (ii) the waiver is of limited scope; (iii) a waiver addresses a concrete problem; and (iv) the waiver does not have undesirable consequences, such as harming third parties.”<sup>1</sup> For the reasons discussed below, PacifiCorp’s requested waiver satisfies each of these four factors.

In light of the fact that PacifiCorp has consulted with the parties in Docket No. ER21-1015-000, PacifiCorp respectfully requests that the Commission provide for a shortened comment period of no more than seven (7) calendar days from the date of this filing and that the Commission issue an order on this request by September 30, 2021.

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<sup>1</sup> *PJM Interconnection, L.L.C.*, 172 FERC ¶ 61,268 at P 15 (2020); *Se. Power Admin.*, 143 FERC ¶ 61,210 (2013) (citing *PJM Interconnection, L.L.C.*, 135 FERC ¶ 61,069 at P 8 (2011); *Hudson Transmission Partners, LLC*, 131 FERC ¶ 61,157 at P 10 (2010)).

## I. Communications

All communications and correspondence regarding this filing should be provided to the following persons:<sup>2</sup>

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## II. Background

On February 1, 2021, PacifiCorp filed revisions to its OATT to update the rates for the following ancillary services: Schedule 2, Reactive Supply and Voltage Control from Generation or Other Sources Service; Schedule 3, Regulation and Frequency Response Service; Schedule 3A, Generator Regulation and Frequency Response Service; Schedule 5, Operating Reserve – Spinning Reserve Service; and Schedule 6, Operating Reserve – Supplemental Reserve Service (“Rate Revisions”).<sup>3</sup> PacifiCorp also filed to revise certain non-rate terms and conditions in Attachment

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<sup>2</sup> To the extent necessary, PacifiCorp requests waiver of Section 385.203(b)(3) of the Commission’s regulations to allow more than two persons identified below to receive service in this proceeding. 18 C.F.R. § 385.203(b)(3) (2021).

<sup>3</sup> PacifiCorp, Transmission OATT and Service Agreements: Schedule 2, Reactive Supply and Voltage CTRL from Gen or Other Sources, 4.0.0; Schedule 3, Regulation and Frequency Response Service, 11.0.0; Schedule 3A,

U of its OATT (“Attachment U Revisions”).<sup>4</sup> PacifiCorp requested that the proposed Rate Revisions be accepted effective January 1, 2021, and that the proposed Attachment U Revisions be accepted July 1, 2021. The revisions were undertaken pursuant to a “2020 Settlement Agreement” entered into by PacifiCorp, Utah Associated Municipal Power Systems (“UAMPS”), Utah Municipal Power Agency (“UMPA”), Deseret Generation and Transmission Co-operative, Inc. (“Deseret”), Bonneville Power Administration, Avangrid Renewables, LLC, EDP Renewables North America LLC, and NextEra Energy Resources, LLC.<sup>5</sup>

Through a letter order issued on April 1, 2021, in Docket No. ER21-1015, the Commission accepted the Rate Revisions effective January 1, 2021, and the Attachment U Revisions effective July 1, 2021, as requested.<sup>6</sup> Attachment U of the PacifiCorp OATT contains certain requirements for self-supply of Operating Reserves under Schedules 5 and 6.

The Attachment U Revisions provided clarification and modified the requirements for self-supply and third-party supply of ancillary services. As a result, the revised Attachment U addressed self-supply and third-party supply of Schedules 3, 3A, 4, 5, 6 and 9. In addition, the revisions to Attachment U, among other things, removed duplicative material, clarified the eligibility requirements for self-supply or third-party resources (including requirements for EIM non-participating resources and for jointly owned units), and identified additional information requirements for self-suppliers.

Section 4.2 of the revised Attachment U addresses self-supply or third-party supply of Schedules 5 and 6, and Section 4.2(C) discusses the deployment requirements that apply to self-

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Generator Regulation and Frequency Response Service, 10.0.0; Schedule 5, Operating Reserve - Spinning Reserve Service, 8.0.0; and Schedule 6, Operating Reserve - Supplemental Reserve Service, 8.0.0.

<sup>4</sup> PacifiCorp, Transmission OATT and Service Agreements, Attachment U, Requirements for Self-Supply of Schedules 5 and 6, 1.0.0.

<sup>5</sup> The entities identified in the text accompanying this note 5 are, collectively, referred to as the “Settling Parties”.

<sup>6</sup> *PacifiCorp*, Docket No. ER21-1015-000, Delegated Letter Order (Apr. 1, 2021).

supply or third-party supply of Schedules 5 and 6 where the resource providing self-supply or third-party supply and the load or resource receiving the service are in the same PacifiCorp Balancing Authority Area. In particular, it provides that Schedules 5 and 6 deployment will occur through an automation process enabled by an interface between PacifiCorp and the Transmission Customer.<sup>7</sup>

Another relevant provision of the revised Attachment U is Section 4.2(H), which addresses self-supply arrangements for jointly-owned units. Section 4.2(H) states:

PacifiCorp agrees to continue to allow Utah Associated Municipal Power Systems (“UAMPS”), the Utah Municipal Power Agency (“UMPA”), and Deseret Generation and Transmission Co-operative, Inc. (“Deseret”) to self-supply from jointly owned units without performance evaluations through October 1, 2021 to allow the parties to work toward mutual agreement on self-supply arrangements specific to jointly owned units. If the parties succeed in agreeing on an approach, the parties will agree to an implementation date that provides a reasonable amount of time to ready their systems for compliance with any agreed-upon approach. If mutual agreement is not reached by September 1, 2021, PacifiCorp and each of UAMPS, UMPA, and Deseret may thereafter make a unilateral filing with FERC pursuant to Sections 205 and 206 of the FPA, respectively.

Since the Commission accepted the Attachment U Revisions, PacifiCorp, UAMPS, UMPA, and Deseret have been engaged in good faith discussions to implement the self-supply of Schedules 5 and 6 under the revised Attachment U (the “implementation discussions”). The implementation discussions have primarily centered around the automation that is required under Section 4.2(C) of revised Attachment U. Compliance with other provisions of revised Attachment U also have been a part of the implementation discussions.

The parties previously requested an extension of the original effective date of July 1, 2021, until October 1, 2021, to allow more time to reach agreement on the implementation of the self-

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<sup>7</sup> Attachment U, Section 4.2(C)(1).

supply automation of Schedules 5 and 6. The Commission granted the requested waiver on June 30, 2021.<sup>8</sup>

Despite the parties' best efforts, the parties will not be able to complete the implementation of the automation process required for the self-supply of Schedules 5 and 6 under Section 4.2(C) of revised Attachment U by October 1, 2021. Among other things, additional work is needed with respect to each of the customers seeking to self-supply in order to resolve the engineering needed to permit connection to the PacifiCorp Energy Management System ("EMS"), including configuration of the data points into the software. Each customer's situation differs in certain technical respects. PacifiCorp also must build automation into the EMS to facilitate the automated dispatch of the customer's resource for self-supply. In addition, testing of the new system for each customer still must take place.

In addition to the self-supply automation efforts, the parties have not yet resolved the jointly-owned unit issues discussed in Section 4.2(H) of Attachment U. Among other things, Section 4.2(H) provides UAMPS, UMPA and Deseret with a limited exception from the Schedules 5 and 6 self-supply performance evaluations required by Attachment U until October 1, 2021. However, due to the delay in implementing Schedules 5 and 6 self-supply automation for customers, the limited exception for jointly-owned unit self-supply should be extended in order to be consistent with a revised effective date of Attachment U.

Accordingly, PacifiCorp requests a waiver to allow the revised Attachment U to become effective March 1, 2022, with a corresponding extension of the expiration date of the limited exception in Section 4.2(H) also until March 1, 2022. The additional time should allow the

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<sup>8</sup> *PacifiCorp*, 175 FERC ¶ 61,265 (2021).

implementation discussions to conclude and the implementation of the required automation to be undertaken and completed.

### **III. Description of Requested Waiver and Consistency with the Commission's Criteria for Approval.**

As noted above, the Commission accepted the Attachment U Revisions effective July 1, 2021. The 2020 Settlement Agreement envisioned that: (1) to the extent any of the Settling Parties wished to self-supply under Schedules 5 and 6, they should be able to do so beginning July 1, 2021, and (2) PacifiCorp and any of the Settling Parties desiring to self-supply would complete all steps necessary to allow the self-supply to commence beginning July 1, 2021. After the Commission granted the prior waiver, that effective date was modified to be October 1, 2021.

UAMPS, UMPA, Deseret, and PacifiCorp have been in active implementation discussions since the settlement agreement in ER21-1015-000, but the implementation discussions are still ongoing despite the parties' joint diligence. Absent a waiver of the current October 1, 2021 effective date, parties will not be able to continue to self-supply Schedules 5 and 6 starting October 1, 2021, because they would not be able to meet the deployment requirements of Section 4.2(C) of revised Attachment U given the status of the implementation discussions. PacifiCorp therefore requests a limited waiver to allow the revised Attachment U to become effective March 1, 2022.

PacifiCorp has conferred with other signatories to the settlement agreement in Docket No. ER21-1015-000 regarding this waiver, and PacifiCorp is authorized to state that the Settling Parties either support or do not object to this requested waiver.

PacifiCorp meets the Commission's requirements for waiver, and, furthermore, granting the waiver would be consistent with other Commission's orders granting waiver requests that extend the effective date for tariff revisions.<sup>9</sup>

(1) PacifiCorp has acted in good faith.

As detailed above, the implementation discussions have been ongoing for several months. The implementation discussions have been more extensive than originally envisioned due in large part to the requirement in Section 4.2(C) of revised Attachment U to use an electronic interface to send deployment signals. UAMPS, UMPA, Deseret, and PacifiCorp have continued to actively engage in implementation discussions regarding the automation process and the interface that must be put in place to enable self-supply of Schedules 5 and 6. PacifiCorp, along with UAMPS, UMPA, and Deseret, have acted in good faith and continue to diligently engage in the necessary implementation discussions.

(2) The requested waiver is limited in scope.

As noted earlier, in the letter order issued on April 1, 2021 in Docket No. ER21-1015, the Commission accepted the revised Attachment U to be effective July 1, 2021. PacifiCorp seeks a limited, five-month extension to allow the revised Attachment U to become effective March 1, 2022, instead of October 1, 2021. PacifiCorp's waiver request is limited in scope as it is seeking only to allow an extension in the effective date of its revised Attachment U.

(3) The requested waiver will address a concrete problem.

In its prior order granting an extension in the effective date of Attachment U, the Commission found that the requested waiver would solve a concrete problem.<sup>10</sup> As noted above,

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<sup>9</sup> See e.g., *Pacific Gas & Electric Co.*, 170 FERC ¶ 61,171 (2020); *PJM Interconnection, L.L.C.*, 164 FERC ¶ 61,004 (2018); *California Independent System Operator Corp.*, 164 FERC ¶ 61,148 (2018); *California Independent System Operator Corp.*, 162 FERC ¶ 61,187 (2018).

<sup>10</sup> *PacifiCorp*, 175 FERC ¶ 61,265 at P 8.

it is clear that the implementation of the automation process required under Section 4.2(C) of revised Attachment U for the self-supply under Schedules 5 and 6 cannot be completed by October 1, 2021. In addition, the limited exception in Section 4.2(H) for jointly-owned units from self-supply performance monitoring would expire on October 1, 2022, prior to the requested adjusted effective date of March 1, 2022, for Attachment U. Accordingly, out of an abundance of caution and to avoid any uncertainty for the Transmission Customers, PacifiCorp requests a waiver to allow the revised Attachment U to become effective on March 1, 2022, and for the limited exception in Section 4.2(H) to continue until March 1, 2022. The waiver will address this concrete problem by delaying the effectiveness of the new deployment requirements under Section 4.2(C) of revised Attachment U for an additional five months.

(4) The requested waiver has no undesirable consequences, such as harming third parties.

The requested waiver will have no undesirable consequences, such as harming third parties. As noted above, the Settling Parties either support or do not object to this requested waiver, and the waiver has no impact beyond deferring the effective date of a discrete section of Attachment U. The Commission found that PacifiCorp's prior waiver request did not have undesirable consequences because granting the waiver does not have an impact beyond deferring the effective date.<sup>11</sup> This finding is also true with respect to the instant waiver request.

#### **IV. Request for Shortened Comment Period and Expedited Action**

PacifiCorp respectfully requests that the Commission provide for a shortened comment period of no more than seven (7) calendar days from the date of this waiver request and that the Commission issue an order on this request by September 30, 2021. There is good cause to grant the request for a shortened comment period because PacifiCorp circulated a draft of this filing to

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<sup>11</sup> *Id.*



the settling parties in Docket No. ER21-1015-000 in advance of filing, the settling parties made minor revisions to some language in the draft, which PacifiCorp accepted, and PacifiCorp is authorized to state that none of the settling parties object to this requested effective date.

With this waiver request, PacifiCorp is including a revised e-Tariff record for Attachment U, reflecting an effective date of March 1, 2022 for Attachment U, as requested herein, including an extended expiration date of March 1, 2022 for the limited exception from self-supply monitoring for jointly-owned units.

**V. Conclusion**

WHEREFORE, for the foregoing reasons, PacifiCorp respectfully requests that the Commission grant the requested limited waiver, and afford the request expedited consideration.

Respectfully submitted,

*/s/ Riley Peck*  
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*Attorney for PacifiCorp*

Dated: September 21, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served the foregoing document upon each of the parties listed in the official Service List compiled by the Secretary in this proceeding.

Dated at Portland, Oregon this 21st day of September, 2021.

*/s/ Christian Marble*  
*Sr. Business Administrator*  
*PacifiCorp*

ATTACHMENT U

Requirements for Self-Supply Ancillary Services

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## **1. Purpose**

The purpose of this Attachment U is to clarify certain practices pertaining to self-supply or third-party supply of Schedule 3 - Regulation and Frequency Response Service, Schedule 3A - Generator Regulation and Frequency Response Service, Schedule 4 - Energy Imbalance Service, Schedule 5 - Operating Reserve - Spinning Reserve Service, Schedule 6 - Operating Reserve - Supplemental Reserve Service, and Schedule 9 - Generator Imbalance Service under the OATT. Self-supply and third-party supply may include pooling agreements, which PacifiCorp shall consider for approval in good faith and on a reasonable, non-discriminatory, case-by-case basis.

## **2. Practice**

The following are the requirements of PacifiCorp, which is the Balancing Authority and Transmission Operator, for Transmission Customers who wish to self-supply or to arrange for third-party purchase of OATT Schedule 3 - Regulation and Frequency Response Service, Schedule 3A - Generator Regulation and Frequency Response Service, Schedule 4 - Energy Imbalance Service, Schedule 5 - Operating Reserve - Spinning Reserve Service, Schedule 6 - Operating Reserve - Supplemental Reserve Service, and Schedule 9 - Generator Imbalance Service. PacifiCorp requires that self-supplied or third-party supplied Ancillary Services satisfy the requirements for the above-referenced schedules under the currently effective PacifiCorp OATT and satisfy the relevant reliability standards of NERC or any successor organization.

## **3. Generally Applicable Provisions**

### **3.1 Service Agreement**

A Transmission Customer requesting to self-supply or to arrange for third-party supply of Schedules 3/3A, 4, 5, 6, or 9 shall execute a revision to its existing transmission service agreement or a separate service agreement with PacifiCorp specifying, as applicable: (1) the detailed arrangements made to supply the services including, but not limited to, specification of the amount of service required to meet the party's Ancillary Services obligation, identification of the resource(s) supplying the service and the Balancing Authority Area where the resource(s) are located; (2) metering and communications equipment; (3) procedures for data exchange or automation; (4) the calculation of the Transmission Customer's obligation; and (5) processes for

forecasting, deploying, and verifying performance of self-supply or third-party supply.

### **3.2 Operating Tests**

PacifiCorp may, after providing notice fifteen (15) business days in advance, require operational testing of the resources identified as providing self-supply or third-party supply of Schedules 3/3A, 4, 5, 6, or 9, in addition to testing performed by the Generation Owner to meet NERC reliability standards or Western Electricity Coordinating Council ("WECC") regional criterion. PacifiCorp will monitor resources designated and accepted for self-supply to ensure compliance with NERC reliability standards, WECC regional criterion, and PacifiCorp requirements for time, output and power quality.

Resources that do not fully comply with NERC reliability standards, WECC regional criterion, and PacifiCorp requirements will be disqualified as self-supply or third-party supply resources until such a time as an operating test establishes that the resource(s) can respond in accordance with NERC reliability standards, WECC regional criterion, and PacifiCorp requirements.

### **3.3 SCADA (metering) requirements for reserves**

For resources to qualify for self-supply or third-party supply of Schedules 3/3A, 4, 5, 6, or 9, the following data must be supplied by the designated self-supply or third-party supply resource. Real time data must be supplied through telemetry acceptable to PacifiCorp.

- Net Generation MW
- Net Generator MVAR
- Real power flow through each of the low side feeder breakers
- Reactive power flow through each of the low side feeder breakers
- Reactive power flow from each of the shunt capacitor banks
- A phase high side transmission voltage
- B phase high side transmission voltage
- C phase high side transmission voltage
- Accumulator pulses for interchange metering kWh
- Status of all low and high side breakers

- 10-minute ramp rate, limited by capacity
- Pmax and Pmin
- Ramp Rate MW/min
- Status - Active/Inactive
- Deploy and Deploy Acknowledge Signals

### **3.4 Failure to Meet Requirements or Failure to Perform**

In the event that any of the requirements set forth in this Attachment U fail to be met, PacifiCorp will resume billing the Transmission Customer for the specific Ancillary Service(s) for which the Transmission Customer has failed to meet the requirements. Beginning on the date of the failure, PacifiCorp will bill the Transmission Customer until such failure is cured. This may include any penalties, charges or other consequences to which PacifiCorp is subject related to the failure. Further detail regarding the process and protocol for addressing failure to meet eligibility requirements or failure to self-supply is set forth below or in the relevant transmission service agreement.

### **3.5 Requests for Additional Information**

PacifiCorp may, consistent with Good Utility Practice, request such additional information, beyond what is specifically required by this Attachment U, from the Transmission Customer regarding the self-supply or third-party supply of an Ancillary Service as is reasonably necessary to ensure that the Ancillary Service is supplied in a reliable manner. All such requests shall be limited to reliability specific data.

PacifiCorp shall treat any information designated as confidential by the Transmission Customer as confidential except to the extent that disclosure of this information is required by another provision of the PacifiCorp OATT, by regulatory or judicial order, or for reliability purposes pursuant to Good Utility Practice. Further, PacifiCorp shall treat this information consistent with the standards of conduct contained in Part 37 of the Commission's regulations.

### **3.6 Rejection of Requests or Termination of Existing Self-Supply or Third-Party Supply Arrangements**

PacifiCorp may, consistent with Good Utility Practice, reject a request for self-supply or third-party supply of Ancillary Service(s) or suspend operation of an existing arrangement for self-supply or third-party supply in the event that such self-

supply or third-party supply will impair reliability of the relevant PacifiCorp Balancing Authority Area or the interconnected electric system. Prior to rejecting a request for self- or third-party supply or suspending an existing arrangement for self- or third-party supply, PacifiCorp shall provide reasonable advance notice to the Transmission Customer and shall discuss the rejection or termination, as applicable, with the Transmission Customer.

### **3.7 Responsibility for Necessary Equipment Installation**

The Transmission Customer is responsible for the installation of all equipment (including but not limited to metering and telecommunications equipment) necessary to meet the requirements to self-supply or purchase third-party supply as specified in this Attachment U. The Transmission Customer will reimburse PacifiCorp or its affiliates for any expenses prudently incurred to accommodate the request for self-supply or third-party supply. The equipment to be installed for self-supply or third-party supply shall be specified in the agreement required by section 3.1.

## **4. SPECIFIC ANCILLARY SERVICE ALTERNATIVE SUPPLY REQUIREMENTS**

### **4.1 SCHEDULE 3/3A - REGULATION AND FREQUENCY RESPONSE SERVICE**

This section sets forth the resource eligibility requirements for self-supply or third-party supply of Schedules 3/3A - Regulation and Frequency Response Service. Additional detail regarding the self-supply or third-party supply of this service will be set forth in the transmission service agreement between the Transmission Customer and PacifiCorp. The agreement may cover, among other things, the Transmission Customer's reserve obligation, elections to self-supply or third-party supply, pooling arrangements, and processes for forecasting, deployment, and performance verification of self-supply or third-party supply of Schedules 3/3A.

#### **A. Generating Resource Eligibility Requirements**

The following resource eligibility requirements apply for the self-supply or third-party supply of Schedules 3/3A (Regulation and Frequency Response Service) where the resource supplying the service and the Network Load or resource requiring this service are in the same PacifiCorp Balancing Authority Areas.

1. The Network Load or resource receiving Schedule 3/3A service through self-supply or third-party supply must have real time metering observable by the Balancing Authority.
2. The resource providing self-supply or third-party supply must be deliverable on transmission within the applicable PacifiCorp BAA.
3. The Transmission Customer must have dedicated capacity for the provision of this service which may not be used to satisfy any other capacity obligations.
4. The resource providing self-supply or third-party supply must have a point of contact that is available any time the resource is designated for Schedule 3/3A.
5. An Energy Imbalance Market ("EIM") non-participating resource must be placed under automatic generation control ("AGC"), which is required to satisfy all Schedule 3/3A requirements in real time and to compensate for instantaneous load swings or resource losses within the PacifiCorp BAA. PacifiCorp reserves the right to determine the quantity and resource priority on AGC within the PacifiCorp BAA to meet the requirements under this section or those set forth in the transmission service agreement.
6. An EIM participating resources providing self-supply or third-party supply must follow the California Independent System Operator ("CAISO") Dispatch Operating Point or grid operator instruction to satisfy all reserve requirements in real time.

In addition to requirements 1 and 3-6 above, the following resource eligibility requirements apply where the resource providing self-supply or third-party supply is located in a non-PacifiCorp Balancing Authority Area (i.e., external resource) and the load or resource requiring this service is in a PacifiCorp BAA.

1. The BAA where the external resource is located ("External Balancing Authority") must be a certified BAA by NERC or its successor organization.



2. The resource providing self-supply or third-party supply must be deliverable on transmission to the applicable PacifiCorp BAA.
3. The external resource must be pseudo-tied to the PacifiCorp BAA. The pseudo-tie must meet the requirements in PacifiCorp Business Practice #25. In addition, the external resource must have observable real-time metering. The customer must provide: (i) documentation of a firm transmission path from the external resource to a PacifiCorp BAA; and a letter from the External Balancing Authority which certifies that Regulation and Frequency Response Service is supplied in accordance with all current policies and guidelines of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Schedule 3/3A to loads that are located physically in another BAA.
4. The External Balancing Authority must make arrangements to appropriately account for the resource in its own reserve obligations.
5. If the pseudo-tie equipment providing the external resource's data to PacifiCorp is not used or not useable, PacifiCorp will bill the Transmission Customer for this service for the duration of the period in which the signal was unavailable, including any and all costs or penalties incurred by PacifiCorp associated with its provision of the service. Inability of the External Balancing Authority to receive the signal by means of the pseudo-tie equipment shall not give rise to charges for this service, unless PacifiCorp also is not able to receive the resource signal and is therefore unable to include the resource in the PacifiCorp BAA Schedule 3/3A obligation. The External Balancing Authority must correct the failure to receive the signal as soon as practicable. If the signal to the External Balancing Authority is not restored expeditiously within the operating day, the self-supply or third-party supply may be terminated and the Transmission Customer will be billed for Schedule 3/3A service for the impacted operating day(s).

## **4.2 SCHEDULE 5 & 6 - OPERATING RESERVES - SPINNING RESERVE SERVICE & SUPPLEMENTAL RESERVE SERVICE**

### **A. Resource Eligibility Requirements**

The following resource eligibility requirements apply for the self-supply or third-party supply of Schedules 5 & 6 (Operating Reserves - Spinning Reserve Service & Supplemental Reserve Service) where the resource and the Network Load or resource requiring this service are in the same PacifiCorp Balancing Authority Areas.

1. The Network Load or resource receiving Schedules 5 & 6 service through self-supply or third-party supply must have real time metering observable by the Balancing Authority.
2. The resource providing self-supply or third-party supply must be deliverable on transmission within the applicable PacifiCorp BAA.
3. The Transmission Customer must have dedicated capacity for the provision of this service which may not be used to satisfy any other capacity obligations.
4. The resource providing self-supply or third-party supply must have a point of contact that is available any time the resource is designated for operating reserve service.
5. For Schedule 5 - Operating Reserves - Spinning Reserve Service, the resource must have uncommitted available capacity which is on-line and loaded at less than maximum output and which may be used to satisfy the Transmission Customer's Schedule 5 obligation.
6. For Schedule 6 - Operating Reserves - Supplemental Reserve Service, the service may be self-supplied or purchased from any resource or interruptible load to meet the Transmission Customer's Schedule 6 obligation. The resource must be capable of serving demand in 10 minutes, or consist of uncommitted available capacity that is on-line and loaded at less than maximum output which can be fully applied in 10 minutes. To provide self-supply, the interruptible load must be located within a PacifiCorp BAA and must be capable of being interrupted and fully deployed within 10 minutes. If the Transmission Customer

seeks to use interruptible load for self-supply or third-party supply, the Transmission Customer must provide a detailed description of the load curtailment method, measurement of the deployment, and process utilized to trigger the curtailment.

7. Transmission Customer must provide, upon request, access to logs, dispatch records or SCADA data to verify that a resource providing self-supply is not fully loaded and has reserves that are actually spinning, and that the reserves are capable of being applied as reported.

8. Each resource must be capable of being evaluated consistent with the performance test described in Section D below. This requirement applies to the self-supplying Transmission Customer's ownership share or resource capacity rights for a jointly owned resource.

9. The resource must be capable of responding to automated deployment signals.

Requirements 1, 3-8 above also apply for the self-supply or third-party supply of Schedules 5 and 6 where the resource is located in an External Balancing Authority and the Network Load or resource receiving this service are in a PacifiCorp BAA. Requirements 2 and 9 do not apply to a generating resource located in an External Balancing Authority.

#### **B. Scheduling Self-Supply or Third-Party Supply of Schedule 5 and 6**

The following scheduling requirements apply for the self-supply or third-party supply of Schedules 5 & 6 where the resource and the load or resource receiving this service are in the same PacifiCorp BAA.

1. The resource providing self-supply or third-party supply must be deliverable on transmission to the applicable PacifiCorp BAA.

2. Transmission Customers must submit day-ahead information that identifies the specific resources and capacity levels designated for Schedule 5 and 6 through the Base Schedule Aggregation Portal ("BSAP"), or other means mutually acceptable to both parties.

3. Schedule 5 and 6 requirements must be scheduled using the CAISO BSAP scheduling portal through Day Ahead rolling seven-day submissions, or other means mutually acceptable to both parties. These submissions can be updated up to 57 minutes before the operating hour.

4. Forecast submissions for resources providing self-supply or third-party supply should be at the unit level if PacifiCorp's network model includes the resource by unit, or at the resource level if PacifiCorp's network model includes the resource at the resource level.

5. BSAP submissions should be entered as "AS-SP" for spin (Schedule 5) or "AS-NS" for non-spin (Schedule 6) values, as appropriate.

### **External Resources**

The following scheduling requirements apply for the self-supply or third-party supply of Schedules 5 & 6 (Operating Reserves - Spinning Reserve Service and Operating Reserves - Supplemental Reserve Service) where the resource providing self-supply or third-party supply and the load or resource receiving this service are in different Balancing Authority Areas.

6. For a resource in an External Balancing Authority, Schedule 5 and 6 requirements must be scheduled using a Capacity e-Tag consistent with PacifiCorp Business Practice #39, E-tagging Reserves or a Dynamic e-Tag consistent with PacifiCorp Business Practice #25.

7. When e-Tagging Schedule 5 and 6 requirements, the Transmission Customer will include one of the following in the comment field to identify the specific type of reserve being e-Tagged:

- RES-SPIN-PUR = Purchased Spinning Reserves
- RES-SPIN-SP = Self-Provided Spinning Reserves
- RES-NS-PUR = Purchased Non-Spinning Reserves
- RES-NS-SP = Self-Provided Non-Spinning Reserves

8. Every day at midnight (PPT), PacifiCorp will capture and record e-Tagged forecast values.

### **C. Deployment of Self-Supply or Third-Party Supply of Schedule 5 and 6**

The following deployment requirements apply for the self-supply or third-party supply of Schedules 5 & 6 where the resource providing self-supply or third-party supply and the load or resource receiving this service are in the same PacifiCorp Balancing Authority Area.

1. Schedule 5 and 6 deployment will occur through an automated process enabled by an interface between PacifiCorp and the Transmission Customer. The interface will be facilitated by a third-party vendor selected by the Transmission Customer. The Transmission Customer is responsible for engaging with a vendor to create an appropriate interface.

2. Deployment signals will be sent automatically through an electronic interface between PacifiCorp, Transmission Customer, and the vendor providing the electronic interface. The signal will identify the amount of Schedule 5 and 6 reserves to deploy. The Transmission Customer must have a point of contact available, all hours and every day, to be used to communicate the deployment of the reserves, when necessary.

3. During a contingency event, the amount of Schedule 5 and 6 reserves called upon for each self-supplying Transmission Customer will be calculated as follows:

(Customer scheduled self-supply / Total PacifiCorp  
BAA (PACE or PACW) Contingency Reserve Obligation)  
\* Generation Loss

4. For each self-supplying Transmission Customer, the deployment obligation is for 60 minutes.

### **External Resources**

In addition to items 3 and 4 above, the following deployment requirements apply for the self-supply or third-party supply of Schedules 5 & 6 where the resource providing self-supply or third-party supply and the load or resource receiving this service are in different Balancing Authority Areas.

5. Consistent with Business Practice #39, when the service is needed, the Schedule 5 and 6 reserves must be deployed by the Transmission Customer. PacifiCorp will confirm that the Transmission Customer's Schedule 5 and 6

reserves are being held via e-Tag. Once confirmation is validated, PacifiCorp will provide an automatic signal to communicate a loss of resource in the appropriate BAA and request deployment of Schedule 5 and 6 reserves. The Transmission Customer will make arrangements for the External Balancing Authority to communicate its Automatic Control Error ("ACE") and an acknowledgement signal to inform PacifiCorp that Schedule 5 and 6 reserves are being deployed.

6. During periods within the hour when Schedule 5 and 6 reserves are required, when using a Capacity e-Tag the Transmission Customer must submit an adjustment of the energy profile on the e-Tag within 7 minutes reflecting the amount of energy flow anticipated for the balance of the hour and subsequent hours. If the Transmission Customer is using a Dynamic e-Tag, then the Transmission Customer must submit updates to the Dynamic e-Tag energy profile with the integrated value (MWh) within 30 minutes after the completion of the operating hour, the e-Tag shall use the value obtained from a common agreed on source, and the e-Tag data must be submitted into the CAISO EIM as part of the base schedules for interchange.

#### **D. Performance Verification & Failure Events**

The following performance requirements apply for the self-supply or third-party supply of Schedules 5 & 6 - Operating Reserves - Spinning Reserve Service and Operating Reserves - Supplemental Reserve Service - where the resource and the Network Load or resource requiring this service are in the same PacifiCorp Balancing Authority Area. Failure of a self-supply resource to physically respond to a call to deploy Schedule 5 or 6 reserves may result in Failure Event and/or an assessment of a strike.

PacifiCorp will count as a single failure event (each a "Failure Event"), any hour or consecutive group of hours that a resource does not successfully respond when deployed to provide reserves and that occurs before PacifiCorp provides written notice of the Failure Event to the resource owner and all Transmission Customers relying on the resource for reserves.

To determine whether a Failure Event has occurred, a performance test will be conducted associated with each call for deployment of Schedule 5 or 6 reserves. The test will be

performed for each resource or group of resources in the following manner:

1. The resource's starting generation (average generation at the time the signal for deployment is sent) will be compared to the average generation 10 minutes following the deployment signal and during minutes 11-60 following the deployment signal.
2. Failure of the 10-minute test results if the average generation value is not greater than or equal to starting generation plus the identified Schedule 5 or 6 reserve obligation.
3. Failure of the 60-minute test results if the average generation value at during minutes 11-60 minutes is not greater than or equal to starting generation plus the identified Schedule 5 or 6 reserve obligation.
4. Failure of either the 10-minute or 60-minute test results in a Failure Event.
5. If the Transmission Customer has indicated that self-supply is available on more than a single resource or a group of resources, the performance test described above will be applied to the total available resources as compared to the average generation of the resource or group of resources.

#### **External Resources**

The following performance requirements apply for the self-supply or third-party supply of Schedules 5 & 6 - Operating Reserves - Spinning Reserve Service and Operating Reserves - Supplemental Reserve Service - where the resource and the Network Load or resource requiring this service are in different Balancing Authority Areas.

6. Failure of a self-supply resource to physically respond to a call to deploy Schedule 5 or 6 reserves may result in Failure Event. To determine whether a Failure Event has occurred, a performance test will be conducted associated with each call for deployment of Schedule 5 or 6 reserves. For Transmission Customers using an external resource to self-supply, the test will be performed for each resource or group of resources in the following manner:

7. PacifiCorp will review whether the e-Tag was implemented within the specified time listed in section C.6 per the e-Tag type, and verify an associated change to the net-scheduled-interchange (NSI) with the External Balancing Authority. If the e-Tag was not implemented and there was not change to NSI, a strike will be issued.

#### **E. Assessment of Strikes**

Upon written notice, a Failure Event may be assessed a "strike." The written notice will inform the Transmission Customer of the underlying Failure Event and the strike. "Written notice" for purposes of this Attachment U includes notice given electronically.

Upon each written assessment of a strike as provided above, and before another strike may be assessed to the same resource, PacifiCorp will allow the affected Transmission Customer(s) up to three business days in which to provide written notice to PacifiCorp of the specific remedy to the resource failure that has been implemented, of alternative self-supply arrangements that have been made, or of the intent to take the applicable reserve service(s) from PacifiCorp. Absent any such written notice to PacifiCorp, the affected Customer(s) shall be subject to the applicable reserve service(s) as defined in Schedule 5 and/or Schedule 6 of PacifiCorp's OATT for the duration of the failure.

A resource that accumulates three strikes within a rolling 12-month period will be disqualified for the balance of the month in which the third strike occurs and the entirety of the following month. PacifiCorp will give affected Transmission Customer(s) written notice of the third strike and resource disqualification. PacifiCorp will allow Transmission Customer(s) up to five business days in which to formally notify PacifiCorp of alternative self-supply arrangements or be subject to the applicable reserve service(s) as defined in Schedule 5 and/or Schedule 6 of PacifiCorp's OATT. No Transmission Customer may designate or utilize a disqualified resource to provide self-supply service. Following the disqualification period, strikes for the resource shall be reset to zero and the resource will be again eligible to provide self-supply service subject to the provisions herein.

If a Failure Event is caused by an unplanned outage of a self-supplying resource or transmission line, no strike will be



issued for the operating hour in which the unplanned outage occurs. Unless the Transmission Customer is able to meet its self-supply obligation through a different resource or group of resources, the Transmission Customer will be billed for Schedules 5 & 6 for the duration of the unplanned outage if an unplanned outage prevents the Transmission Customer from fulfilling its self-supply obligation. The Transmission Customer may be required to supply documentation of the unplanned outage and demonstration that the Failure Event was caused by that outage.

PacifiCorp will provide written reports of all performance evaluation results to the resource owner and the Transmission Customer(s) using the resource for self-supply, if different.

**F. Settlement of Self-Supply or Third-Party Supply of Schedule 5 and 6**

Energy supplied by a Transmission Customer during periods of Schedule 5 or 6 reserve deployment for resources located within a PacifiCorp BAA will be settled financially for the amount of energy deployed by the Transmission Customer's resource in accordance with Schedule 9 of PacifiCorp's OATT.

Energy supplied by a Transmission Customer during periods of Schedule 5 or 6 reserve deployment for resources located outside of a PacifiCorp BAA will be settled financially for the amount of energy deployed by the Transmission Customer's resource in accordance with Attachment T of PacifiCorp's OATT.

**G. Monthly Report To Customers Regarding Schedule 5 and 6 Deployment**

PacifiCorp will provide a monthly report to all self-supplying Transmission Customers that includes the following information for each deployment of Schedule 5 or 6 reserves:

- Contingency ID number
- North West Power Pool Reserves (committed or requested)
- Date, Event Start Time
- Reason for Deployment that identifies the regional event declared, or other reason why the deployment occurred (transmission or generator)
- Total MW Loss

Customers may request additional information beyond that provided in the monthly report. PacifiCorp shall provide such information or explain why it believes that it may not properly do so.

#### **H. Exclusion of Certain Jointly Owned Units**

PacifiCorp agrees to continue to allow Utah Associated Municipal Power Systems ("UAMPS"), the Utah Municipal Power Agency ("UMPA"), and Deseret Generation and Transmission Cooperative, Inc. ("Deseret") to self-supply from jointly owned units without performance evaluations through October 1, 2021 to allow the parties to work toward mutual agreement on self-supply arrangements specific to jointly owned units. If the parties succeed in agreeing on an approach, the parties will agree to an implementation date that provides a reasonable amount of time to ready their systems for compliance with any agreed-upon approach. If mutual agreement is not reached by September 1, 2021, PacifiCorp and each of UAMPS, UMPA, and Deseret may thereafter make a unilateral filing with FERC pursuant to Sections 205 and 206 of the FPA, respectively.

### **4.3 SCHEDULE 4 - ENERGY IMBALANCE SERVICE**

#### **A. Eligibility Requirements**

The following eligibility requirements apply for the self-supply or third-party supply of Schedule 4 - Energy Imbalance Service

1. The specific Network Loads for which the service is to be provided must be the total Network Load obligation within the PacifiCorp Balancing Authority Area and have observable real-time metering and telemetry.
2. The resources providing the service must be located in the same PacifiCorp Balancing Authority Area as the Network Load and must have observable real time metering.
3. The resource providing the service must be deliverable resources as defined by a current transmission service agreement or resources that are interconnected to PacifiCorp's system and have an active generation interconnection agreement with PacifiCorp.

4. The capacity used for this service must be dedicated to Network Load service requirements and may not being used to satisfy any other capacity obligations.

5. The resource (or a resource dispatch center) must have a point of contact that is available any time the resource is designated for regulation and frequency response service.

6. The Transmission Customer must designate adequate resources to satisfy the Network Load obligation at all times. The designated resources must be under automatic generation control, satisfying all reserve requirements in real time and as required to compensate for instantaneous load swings or generation losses within the PacifiCorp BAA. The Transmission Provider reserves the right to determine the quantity and location of resources placed under AGC within the PacifiCorp BAA.

**B. Resources Moved Electronically to External Balancing Authority**

If the metered Network Load requiring imbalance service has been moved electronically into an External Balancing Authority, certified by NERC or its successor organization, by means of a pseudo-tie, this Section B shall apply.

1. The pseudo-tie requires identification and observable real-time metering of the specific Network Loads for which the service is to be provided. PacifiCorp requires a letter in advance from the External Balancing Authority which certifies that this service is supplied in accordance with all current policies and guidelines of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Ancillary Services to loads that are located physically in an External Balancing Authority Area.

2. PacifiCorp will accept, in lieu of the showing required in Section A.1 above, a letter in advance from the External Balancing Authority which certifies that this service is supplied in accordance with all current policies and guides of the NERC Operating Manual, NERC

Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Ancillary Services to loads that are physically located in an External Balancing Authority Area.

3. Whenever the pseudo-tie equipment providing the Network Load's data to PacifiCorp or the External Balancing Authority is not used or not useable, the dispatcher for the entity that is not receiving the load signal shall immediately contact the dispatcher for the other entity to inform it of the loss of the signal. Thereafter, until both entities are again receiving the load signal through the pseudo-tie equipment, the Transmission Customer should provide fixed schedules from the External Balancing Authority each hour to minimize the impact of load imbalance.

4. If the External Balancing Authority or the supplier of imbalance service fails to meet the requirements set forth in Section B.2 (i.e., fails to notify PacifiCorp of the External Balancing Authority's loss of its ability to receive the Network Load's signal or fails to supply fixed schedule adjustments when called upon by PacifiCorp), PacifiCorp reserves the right to bill the Transmission Customer for this service for the duration of the failure, including reimbursement for any penalties according to Schedules 4 or 9 in the PacifiCorp OATT, charges or other consequences which PacifiCorp is subject to, related to the failure.

5. PacifiCorp reserves the right to request more information from the External Balancing Authority or the Network Load's supplier of imbalance service, in addition to the above referenced letter, to ensure that this service is supplied in a reliable manner. Further, PacifiCorp reserves the right to reject the request to self-supply or third-party supply such service, in the event that PacifiCorp, in its reasonable judgment, concludes that such self-supply or third-party purchase would impair reliability in the relevant PacifiCorp BAA or the interconnected system. PacifiCorp also reserves the right to terminate the self-supply or third-party supply if, in its reasonable judgment, PacifiCorp concludes that such self-supply or third-party supply is impairing reliability in the relevant PacifiCorp Balancing Authority Area or the interconnected system.

#### **4.4 SCHEDULE 9 - GENERATOR IMBALANCE SERVICE**

##### **A. Self-Supply Under Schedule 3 Entities**

For load serving entities who have certified as a self-supply entity for regulation and frequency response service (Schedule 3) under the requirements of this Attachment U and request generator imbalance self-certification, this Section A shall apply. Generator Imbalance Service may be self-supplied from Resources or undesignated Network Resources located within the PacifiCorp BAA under the limited set of conditions defined below. Self-supply of Generator Imbalance service created by fixed point-to-point schedules can only be provided for resources located in the PacifiCorp BAA.

The following information will be required to demonstrate that the self-supply of generator imbalance service created by point-to-point schedules during generator derates or unit tripping:

1. The resources providing the service must have observable real time metering. In addition, PacifiCorp will define specific OASIS scheduling points of receipt which will apply to Customer's requesting self-supply. Customers will be obligated to demonstrate self-supply from these specific OASIS points of receipt within the PacifiCorp BAA for purposes of this section. The current list of OASIS points of receipt for section is ("PACE", "PACEW", and "PACW"). PacifiCorp reserves the right to modify this list without notice as required to maintain transmission system reliability and compliance with the PacifiCorp OATT.
2. Documentation that the resources are deliverable Resources or Network Resources and are defined by a current Network Integration Transmission Service Agreement, interconnection agreement, or legacy load service agreement on file at FERC.
3. Any Network Resources used to supply point-to-point imbalance service must be undesignated according to the PacifiCorp business practice, "Termination of Network Resources", consistent with section 30.3 of the PacifiCorp OATT. The resources utilized must be undesignated from

within specified OASIS points of receipt to self-supply point-to-point transactions originating from that particular point of receipt.

4. Resources or undesignated Network Resources must be on-line, spinning, and responsive to the loss of another undesignated unit.

5. The hourly quantity of resources or undesignated Network Resources with a point of receipt plus the purchases made and delivered on point-to-point service into each PacifiCorp point of receipt must exceed the total quantity of point-to-point transactions exiting the defined point of receipt and PacifiCorp BAA for each hour.

6. Adequate resources must remain 'designated' and available for load service as required to satisfy the Customer's Network Load obligation at all times during any period of point-to-point self-supply.

7. The party claiming generation imbalance self-supply must be previously certified as self-providing, or purchasing from third parties, regulation and frequency response service (Schedule 3) as specified in this Attachment U.

8. A point of contact is always available, all hours, every day to be used to call on resources necessary for load coverage.

#### **B. Resources Moved Electronically to External Balancing Authority**

If the Resource requiring imbalance service has been moved electronically into an External Balancing Authority Area, certified by NERC or its successor organization, by means of a pseudo-tie, this Section B shall apply. The point-to-point transmission service for the pseudo-tie resource will be established. Intra-hour transfers and the associated transmission service provided will be defined as the instantaneous output of the resource, therefore imbalance will be deemed to be self-supplied. End of hour true-ups of actual hourly integrated values are required for Balancing Authority Area energy accounting purposes.

1. The pseudo-tie requires identification and observable real-time metering of the specific Resource for which the service is to be provided. PacifiCorp requires a letter in advance from the External Balancing Authority which certifies that this service is supplied in accordance with all current policies and guidelines of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Ancillary Services to loads that are located physically in another Balancing Authority Area.

2. PacifiCorp will accept, in lieu of the showing required in Section A.1 above, a letter in advance from the External Balancing Authority which certifies that this service is supplied in accordance with all current policies and guides of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Ancillary Services to resources that are electronically transferred into another Balancing Authority.

3. Whenever the pseudo-tie equipment providing the Resource's data to PacifiCorp or the External Balancing Authority is not used or not useable, the dispatcher for the entity that is not receiving the load signal shall immediately contact the dispatcher for the other entity to inform it of the loss of the signal. Thereafter, until both entities are again receiving the load signal through the pseudo-tie equipment, the Transmission Customer should provide fixed schedules from the External Balancing Authority each hour to minimize the impact of generator imbalance.

## ATTACHMENT U

### Requirements for Self-Supply Ancillary Services

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## **1. Purpose**

The purpose of this Attachment U is to clarify certain practices pertaining to self-supply or third-party supply of Schedule 3 - Regulation and Frequency Response Service, Schedule 3A - Generator Regulation and Frequency Response Service, Schedule 4 - Energy Imbalance Service, Schedule 5 - Operating Reserve - Spinning Reserve Service, Schedule 6 - Operating Reserve - Supplemental Reserve Service, and Schedule 9 - Generator Imbalance Service under the OATT. Self-supply and third-party supply may include pooling agreements, which PacifiCorp shall consider for approval in good faith and on a reasonable, non-discriminatory, case-by-case basis.

## **2. Practice**

The following are the requirements of PacifiCorp, which is the Balancing Authority and Transmission Operator, for Transmission Customers who wish to self-supply or to arrange for third-party purchase of OATT Schedule 3 - Regulation and Frequency Response Service, Schedule 3A - Generator Regulation and Frequency Response Service, Schedule 4 - Energy Imbalance Service, Schedule 5 - Operating Reserve - Spinning Reserve Service, Schedule 6 - Operating Reserve - Supplemental Reserve Service, and Schedule 9 - Generator Imbalance Service. PacifiCorp requires that self-supplied or third-party supplied Ancillary Services satisfy the requirements for the above-referenced schedules under the currently effective PacifiCorp OATT and satisfy the relevant reliability standards of NERC or any successor organization.

## **3. Generally Applicable Provisions**

### **3.1 Service Agreement**

A Transmission Customer requesting to self-supply or to arrange for third-party supply of Schedules 3/3A, 4, 5, 6, or 9 shall execute a revision to its existing transmission service agreement or a separate service agreement with PacifiCorp specifying, as applicable: (1) the detailed arrangements made to supply the services including, but not limited to, specification of the amount of service required to meet the party's Ancillary Services obligation, identification of the resource(s) supplying the service and the Balancing Authority Area where the resource(s) are located; (2) metering and communications equipment; (3) procedures for data exchange or automation; (4) the calculation of the Transmission Customer's obligation; and (5) processes for forecasting, deploying, and verifying performance of self-supply or third-party supply.

### **3.2 Operating Tests**

PacifiCorp may, after providing notice fifteen (15) business days in advance, require operational testing of the resources identified as providing self-supply or third-party supply of Schedules 3/3A, 4, 5, 6, or 9, in addition to testing performed by the Generation Owner to meet NERC reliability standards or Western Electricity Coordinating Council ("WECC") regional criterion. PacifiCorp will monitor resources designated and accepted for self-supply to ensure compliance with NERC reliability standards, WECC regional criterion, and PacifiCorp requirements for time, output and power quality.

Resources that do not fully comply with NERC reliability standards, WECC regional criterion, and PacifiCorp requirements will be disqualified as self-supply or third-party supply resources until such a time as an operating test establishes that the resource(s) can respond in accordance with NERC reliability standards, WECC regional criterion, and PacifiCorp requirements.

### **3.3 SCADA (metering) requirements for reserves**

For resources to qualify for self-supply or third-party supply of Schedules 3/3A, 4, 5, 6, or 9, the following data must be supplied by the designated self-supply or third-party supply resource. Real time data must be supplied through telemetry acceptable to PacifiCorp.

- Net Generation MW
- Net Generator MVA<sub>r</sub>
- Real power flow through each of the low side feeder breakers
- Reactive power flow through each of the low side feeder breakers
- Reactive power flow from each of the shunt capacitor banks
- A phase high side transmission voltage
- B phase high side transmission voltage
- C phase high side transmission voltage
- Accumulator pulses for interchange metering kWh
- Status of all low and high side breakers
- 10-minute ramp rate, limited by capacity
- P<sub>max</sub> and P<sub>min</sub>
- Ramp Rate MW/min
- Status - Active/Inactive
- Deploy and Deploy Acknowledge Signals

### **3.4 Failure to Meet Requirements or Failure to Perform**

In the event that any of the requirements set forth in this Attachment U fail to be met, PacifiCorp will resume billing the Transmission Customer for the specific Ancillary Service(s) for which the Transmission Customer has failed to meet the requirements. Beginning on the date of the failure, PacifiCorp will bill the Transmission Customer until such failure is cured. This may include any penalties, charges or other consequences to which PacifiCorp is subject related to the failure. Further detail regarding the process and protocol for addressing failure to meet eligibility requirements or failure to self-supply is set forth below or in the relevant transmission service agreement.

### **3.5 Requests for Additional Information**

PacifiCorp may, consistent with Good Utility Practice, request such additional information, beyond what is specifically required by this Attachment U, from the Transmission Customer regarding the self-supply or third-party supply of an Ancillary Service as is reasonably necessary to ensure that the Ancillary Service is supplied in a reliable manner. All such requests shall be limited to reliability specific data.

PacifiCorp shall treat any information designated as confidential by the Transmission Customer as confidential except to the extent that disclosure of this information is required by another provision of the PacifiCorp OATT, by regulatory or judicial order, or for reliability purposes pursuant to Good Utility Practice. Further, PacifiCorp shall treat this information consistent with the standards of conduct contained in Part 37 of the Commission's regulations.

### **3.6 Rejection of Requests or Termination of Existing Self-Supply or Third-Party Supply Arrangements**

PacifiCorp may, consistent with Good Utility Practice, reject a request for self-supply or third-party supply of Ancillary Service(s) or suspend operation of an existing arrangement for self-supply or third-party supply in the event that such self-supply or third-party supply will impair reliability of the relevant PacifiCorp Balancing Authority Area or the interconnected electric system. Prior to rejecting a request for self- or third-party supply or suspending an existing arrangement for self- or third-party supply, PacifiCorp shall provide reasonable advance notice to the Transmission Customer and shall discuss the rejection or termination, as applicable, with the Transmission Customer.

### **3.7 Responsibility for Necessary Equipment Installation**

The Transmission Customer is responsible for the installation of all equipment (including but not limited to metering and telecommunications equipment) necessary to meet the requirements to self-supply or purchase third-party supply as specified in this Attachment U. The Transmission Customer will reimburse PacifiCorp or its affiliates for any expenses prudently incurred to accommodate the request for self-supply or third-party supply. The equipment to be installed for self-supply or third-party supply shall be specified in the agreement required by section 3.1.

#### **4. SPECIFIC ANCILLARY SERVICE ALTERNATIVE SUPPLY REQUIREMENTS**

##### **4.1 SCHEDULE 3/3A - REGULATION AND FREQUENCY RESPONSE SERVICE**

This section sets forth the resource eligibility requirements for self-supply or third-party supply of Schedules 3/3A - Regulation and Frequency Response Service. Additional detail regarding the self-supply or third-party supply of this service will be set forth in the transmission service agreement between the Transmission Customer and PacifiCorp. The agreement may cover, among other things, the Transmission Customer's reserve obligation, elections to self-supply or third-party supply, pooling arrangements, and processes for forecasting, deployment, and performance verification of self-supply or third-party supply of Schedules 3/3A.

##### **A. Generating Resource Eligibility Requirements**

The following resource eligibility requirements apply for the self-supply or third-party supply of Schedules 3/3A (Regulation and Frequency Response Service) where the resource supplying the service and the Network Load or resource requiring this service are in the same PacifiCorp Balancing Authority Areas.

1. The Network Load or resource receiving Schedule 3/3A service through self-supply or third-party supply must have real time metering observable by the Balancing Authority.
2. The resource providing self-supply or third-party supply must be deliverable on transmission within the applicable PacifiCorp BAA.
3. The Transmission Customer must have dedicated capacity for the provision of this service which may not be used to satisfy any other capacity obligations.

4. The resource providing self-supply or third-party supply must have a point of contact that is available any time the resource is designated for Schedule 3/3A.

5. An Energy Imbalance Market ("EIM") non-participating resource must be placed under automatic generation control ("AGC"), which is required to satisfy all Schedule 3/3A requirements in real time and to compensate for instantaneous load swings or resource losses within the PacifiCorp BAA. PacifiCorp reserves the right to determine the quantity and resource priority on AGC within the PacifiCorp BAA to meet the requirements under this section or those set forth in the transmission service agreement.

6. An EIM participating resources providing self-supply or third-party supply must follow the California Independent System Operator ("CAISO") Dispatch Operating Point or grid operator instruction to satisfy all reserve requirements in real time.

In addition to requirements 1 and 3-6 above, the following resource eligibility requirements apply where the resource providing self-supply or third-party supply is located in a non-PacifiCorp Balancing Authority Area (i.e., external resource) and the load or resource requiring this service is in a PacifiCorp BAA.

1. The BAA where the external resource is located ("External Balancing Authority") must be a certified BAA by NERC or its successor organization.

2. The resource providing self-supply or third-party supply must be deliverable on transmission to the applicable PacifiCorp BAA.

3. The external resource must be pseudo-tied to the PacifiCorp BAA. The pseudo-tie must meet the requirements in PacifiCorp Business Practice #25. In addition, the external resource must have observable real-time metering. The customer must provide: (i) documentation of a firm transmission path from the external resource to a PacifiCorp BAA; and a letter from the External Balancing Authority which certifies that Regulation and Frequency Response Service is supplied in accordance with all current policies and guidelines of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying

Schedule 3/3A to loads that are located physically in another BAA.

4. The External Balancing Authority must make arrangements to appropriately account for the resource in its own reserve obligations.

5. If the pseudo-tie equipment providing the external resource's data to PacifiCorp is not used or not useable, PacifiCorp will bill the Transmission Customer for this service for the duration of the period in which the signal was unavailable, including any and all costs or penalties incurred by PacifiCorp associated with its provision of the service. Inability of the External Balancing Authority to receive the signal by means of the pseudo-tie equipment shall not give rise to charges for this service, unless PacifiCorp also is not able to receive the resource signal and is therefore unable to include the resource in the PacifiCorp BAA Schedule 3/3A obligation. The External Balancing Authority must correct the failure to receive the signal as soon as practicable. If the signal to the External Balancing Authority is not restored expeditiously within the operating day, the self-supply or third-party supply may be terminated and the Transmission Customer will be billed for Schedule 3/3A service for the impacted operating day(s).

#### **4.2 SCHEDULE 5 & 6 - OPERATING RESERVES - SPINNING RESERVE SERVICE & SUPPLEMENTAL RESERVE SERVICE**

##### **A. Resource Eligibility Requirements**

The following resource eligibility requirements apply for the self-supply or third-party supply of Schedules 5 & 6 (Operating Reserves - Spinning Reserve Service & Supplemental Reserve Service) where the resource and the Network Load or resource requiring this service are in the same PacifiCorp Balancing Authority Areas.

1. The Network Load or resource receiving Schedules 5 & 6 service through self-supply or third-party supply must have real time metering observable by the Balancing Authority.

2. The resource providing self-supply or third-party supply must be deliverable on transmission within the applicable PacifiCorp BAA.

3. The Transmission Customer must have dedicated capacity for the provision of this service which may not be used to satisfy any other capacity obligations.
4. The resource providing self-supply or third-party supply must have a point of contact that is available any time the resource is designated for operating reserve service.
5. For Schedule 5 - Operating Reserves - Spinning Reserve Service, the resource must have uncommitted available capacity which is on-line and loaded at less than maximum output and which may be used to satisfy the Transmission Customer's Schedule 5 obligation.
6. For Schedule 6 - Operating Reserves - Supplemental Reserve Service, the service may be self-supplied or purchased from any resource or interruptible load to meet the Transmission Customer's Schedule 6 obligation. The resource must be capable of serving demand in 10 minutes, or consist of uncommitted available capacity that is on-line and loaded at less than maximum output which can be fully applied in 10 minutes. To provide self-supply, the interruptible load must be located within a PacifiCorp BAA and must be capable of being interrupted and fully deployed within 10 minutes. If the Transmission Customer seeks to use interruptible load for self-supply or third-party supply, the Transmission Customer must provide a detailed description of the load curtailment method, measurement of the deployment, and process utilized to trigger the curtailment.
7. Transmission Customer must provide, upon request, access to logs, dispatch records or SCADA data to verify that a resource providing self-supply is not fully loaded and has reserves that are actually spinning, and that the reserves are capable of being applied as reported.
8. Each resource must be capable of being evaluated consistent with the performance test described in Section D below. This requirement applies to the self-supplying Transmission Customer's ownership share or resource capacity rights for a jointly owned resource.
9. The resource must be capable of responding to automated deployment signals.

Requirements 1, 3-8 above also apply for the self-supply or third-party supply of Schedules 5 and 6 where the resource is located in an External Balancing Authority and the Network Load or resource receiving this service are in a PacifiCorp BAA.

Requirements 2 and 9 do not apply to a generating resource located in an External Balancing Authority.

**B. Scheduling Self-Supply or Third-Party Supply of Schedule 5 and 6**

The following scheduling requirements apply for the self-supply or third-party supply of Schedules 5 & 6 where the resource and the load or resource receiving this service are in the same PacifiCorp BAA.

1. The resource providing self-supply or third-party supply must be deliverable on transmission to the applicable PacifiCorp BAA.
2. Transmission Customers must submit day-ahead information that identifies the specific resources and capacity levels designated for Schedule 5 and 6 through the Base Schedule Aggregation Portal ("BSAP"), or other means mutually acceptable to both parties.
3. Schedule 5 and 6 requirements must be scheduled using the CAISO BSAP scheduling portal through Day Ahead rolling seven-day submissions, or other means mutually acceptable to both parties. These submissions can be updated up to 57 minutes before the operating hour.
4. Forecast submissions for resources providing self-supply or third-party supply should be at the unit level if PacifiCorp's network model includes the resource by unit, or at the resource level if PacifiCorp's network model includes the resource at the resource level.
5. BSAP submissions should be entered as "AS-SP" for spin (Schedule 5) or "AS-NS" for non-spin (Schedule 6) values, as appropriate.

**External Resources**

The following scheduling requirements apply for the self-supply or third-party supply of Schedules 5 & 6 (Operating Reserves - Spinning Reserve Service and Operating Reserves - Supplemental Reserve Service) where the resource providing self-supply or third-party supply and the load or resource receiving this service are in different Balancing Authority Areas.

6. For a resource in an External Balancing Authority, Schedule 5 and 6 requirements must be scheduled using a Capacity e-Tag consistent with PacifiCorp Business



Practice #39, E-tagging Reserves or a Dynamic e-Tag consistent with PacifiCorp Business Practice #25.

7. When e-Tagging Schedule 5 and 6 requirements, the Transmission Customer will include one of the following in the comment field to identify the specific type of reserve being e-Tagged:

- RES-SPIN-PUR = Purchased Spinning Reserves
- RES-SPIN-SP = Self-Provided Spinning Reserves
- RES-NS-PUR = Purchased Non-Spinning Reserves
- RES-NS-SP = Self-Provided Non-Spinning Reserves

8. Every day at midnight (PPT), PacifiCorp will capture and record e-Tagged forecast values.

**C. Deployment of Self-Supply or Third-Party Supply of Schedule 5 and 6**

The following deployment requirements apply for the self-supply or third-party supply of Schedules 5 & 6 where the resource providing self-supply or third-party supply and the load or resource receiving this service are in the same PacifiCorp Balancing Authority Area.

1. Schedule 5 and 6 deployment will occur through an automated process enabled by an interface between PacifiCorp and the Transmission Customer. The interface will be facilitated by a third-party vendor selected by the Transmission Customer. The Transmission Customer is responsible for engaging with a vendor to create an appropriate interface.

2. Deployment signals will be sent automatically through an electronic interface between PacifiCorp, Transmission Customer, and the vendor providing the electronic interface. The signal will identify the amount of Schedule 5 and 6 reserves to deploy. The Transmission Customer must have a point of contact available, all hours and every day, to be used to communicate the deployment of the reserves, when necessary.

3. During a contingency event, the amount of Schedule 5 and 6 reserves called upon for each self-supplying Transmission Customer will be calculated as follows:

(Customer scheduled self-supply / Total PacifiCorp  
BAA (PACE or PACW) Contingency Reserve Obligation)  
\* Generation Loss

4. For each self-supplying Transmission Customer, the deployment obligation is for 60 minutes.

#### **External Resources**

In addition to items 3 and 4 above, the following deployment requirements apply for the self-supply or third-party supply of Schedules 5 & 6 where the resource providing self-supply or third-party supply and the load or resource receiving this service are in different Balancing Authority Areas.

5. Consistent with Business Practice #39, when the service is needed, the Schedule 5 and 6 reserves must be deployed by the Transmission Customer. PacifiCorp will confirm that the Transmission Customer's Schedule 5 and 6 reserves are being held via e-Tag. Once confirmation is validated, PacifiCorp will provide an automatic signal to communicate a loss of resource in the appropriate BAA and request deployment of Schedule 5 and 6 reserves. The Transmission Customer will make arrangements for the External Balancing Authority to communicate its Automatic Control Error ("ACE") and an acknowledgement signal to inform PacifiCorp that Schedule 5 and 6 reserves are being deployed.

6. During periods within the hour when Schedule 5 and 6 reserves are required, when using a Capacity e-Tag the Transmission Customer must submit an adjustment of the energy profile on the e-Tag within 7 minutes reflecting the amount of energy flow anticipated for the balance of the hour and subsequent hours. If the Transmission Customer is using a Dynamic e-Tag, then the Transmission Customer must submit updates to the Dynamic e-Tag energy profile with the integrated value (MWh) within 30 minutes after the completion of the operating hour, the e-Tag shall use the value obtained from a common agreed on source, and the e-Tag data must be submitted into the CAISO EIM as part of the base schedules for interchange.

#### **D. Performance Verification & Failure Events**

The following performance requirements apply for the self-supply or third-party supply of Schedules 5 & 6 - Operating Reserves - Spinning Reserve Service and Operating Reserves - Supplemental Reserve Service - where the resource and the Network Load or resource requiring this service are in the same PacifiCorp Balancing Authority Area. Failure of a self-supply resource to physically respond to a call to deploy

Schedule 5 or 6 reserves may result in Failure Event and/or an assessment of a strike.

PacifiCorp will count as a single failure event (each a "Failure Event"), any hour or consecutive group of hours that a resource does not successfully respond when deployed to provide reserves and that occurs before PacifiCorp provides written notice of the Failure Event to the resource owner and all Transmission Customers relying on the resource for reserves.

To determine whether a Failure Event has occurred, a performance test will be conducted associated with each call for deployment of Schedule 5 or 6 reserves. The test will be performed for each resource or group of resources in the following manner:

1. The resource's starting generation (average generation at the time the signal for deployment is sent) will be compared to the average generation 10 minutes following the deployment signal and during minutes 11-60 following the deployment signal.
2. Failure of the 10-minute test results if the average generation value is not greater than or equal to starting generation plus the identified Schedule 5 or 6 reserve obligation.
3. Failure of the 60-minute test results if the average generation value at during minutes 11-60 minutes is not greater than or equal to starting generation plus the identified Schedule 5 or 6 reserve obligation.
4. Failure of either the 10-minute or 60-minute test results in a Failure Event.
5. If the Transmission Customer has indicated that self-supply is available on more than a single resource or a group of resources, the performance test described above will be applied to the total available resources as compared to the average generation of the resource or group of resources.

#### **External Resources**

The following performance requirements apply for the self-supply or third-party supply of Schedules 5 & 6 - Operating Reserves - Spinning Reserve Service and Operating Reserves - Supplemental Reserve Service - where the resource and the Network Load or resource requiring this service are in different Balancing Authority Areas.

6. Failure of a self-supply resource to physically respond to a call to deploy Schedule 5 or 6 reserves may result in Failure Event. To determine whether a Failure Event has occurred, a performance test will be conducted associated with each call for deployment of Schedule 5 or 6 reserves. For Transmission Customers using an external resource to self-supply, the test will be performed for each resource or group of resources in the following manner:

7. PacifiCorp will review whether the e-Tag was implemented within the specified time listed in section C.6 per the e-Tag type, and verify an associated change to the net-scheduled-interchange (NSI) with the External Balancing Authority. If the e-Tag was not implemented and there was not change to NSI, a strike will be issued.

#### **E. Assessment of Strikes**

Upon written notice, a Failure Event may be assessed a "strike." The written notice will inform the Transmission Customer of the underlying Failure Event and the strike. "Written notice" for purposes of this Attachment U includes notice given electronically.

Upon each written assessment of a strike as provided above, and before another strike may be assessed to the same resource, PacifiCorp will allow the affected Transmission Customer(s) up to three business days in which to provide written notice to PacifiCorp of the specific remedy to the resource failure that has been implemented, of alternative self-supply arrangements that have been made, or of the intent to take the applicable reserve service(s) from PacifiCorp. Absent any such written notice to PacifiCorp, the affected Customer(s) shall be subject to the applicable reserve service(s) as defined in Schedule 5 and/or Schedule 6 of PacifiCorp's OATT for the duration of the failure.

A resource that accumulates three strikes within a rolling 12-month period will be disqualified for the balance of the month in which the third strike occurs and the entirety of the following month. PacifiCorp will give affected Transmission Customer(s) written notice of the third strike and resource disqualification. PacifiCorp will allow Transmission Customer(s) up to five business days in which to formally notify PacifiCorp of alternative self-supply arrangements or be subject to the applicable reserve service(s) as defined in Schedule 5 and/or Schedule 6 of PacifiCorp's OATT. No Transmission Customer may designate or utilize a disqualified resource to provide self-supply service. Following the disqualification period, strikes for the resource shall be

reset to zero and the resource will be again eligible to provide self-supply service subject to the provisions herein.

If a Failure Event is caused by an unplanned outage of a self-supplying resource or transmission line, no strike will be issued for the operating hour in which the unplanned outage occurs. Unless the Transmission Customer is able to meet its self-supply obligation through a different resource or group of resources, the Transmission Customer will be billed for Schedules 5 & 6 for the duration of the unplanned outage if an unplanned outage prevents the Transmission Customer from fulfilling its self-supply obligation. The Transmission Customer may be required to supply documentation of the unplanned outage and demonstration that the Failure Event was caused by that outage.

PacifiCorp will provide written reports of all performance evaluation results to the resource owner and the Transmission Customer(s) using the resource for self-supply, if different.

**F. Settlement of Self-Supply or Third-Party Supply of Schedule 5 and 6**

Energy supplied by a Transmission Customer during periods of Schedule 5 or 6 reserve deployment for resources located within a PacifiCorp BAA will be settled financially for the amount of energy deployed by the Transmission Customer's resource in accordance with Schedule 9 of PacifiCorp's OATT.

Energy supplied by a Transmission Customer during periods of Schedule 5 or 6 reserve deployment for resources located outside of a PacifiCorp BAA will be settled financially for the amount of energy deployed by the Transmission Customer's resource in accordance with Attachment T of PacifiCorp's OATT.

**G. Monthly Report To Customers Regarding Schedule 5 and 6 Deployment**

PacifiCorp will provide a monthly report to all self-supplying Transmission Customers that includes the following information for each deployment of Schedule 5 or 6 reserves:

- Contingency ID number
- North West Power Pool Reserves (committed or requested)
- Date, Event Start Time
- Reason for Deployment that identifies the regional event declared, or other reason why the deployment occurred (transmission or generator)
- Total MW Loss

Customers may request additional information beyond that provided in the monthly report. PacifiCorp shall provide such information or explain why it believes that it may not properly do so.

#### **H. Exclusion of Certain Jointly Owned Units**

PacifiCorp agrees to continue to allow Utah Associated Municipal Power Systems ("UAMPS"), the Utah Municipal Power Agency ("UMPA"), and Deseret Generation and Transmission Co-operative, Inc. ("Deseret") to self-supply from jointly owned units without performance evaluations through October 1, 2021 to allow the parties to work toward mutual agreement on self-supply arrangements specific to jointly owned units. If the parties succeed in agreeing on an approach, the parties will agree to an implementation date that provides a reasonable amount of time to ready their systems for compliance with any agreed-upon approach. If mutual agreement is not reached by September 1, 2021, PacifiCorp and each of UAMPS, UMPA, and Deseret may thereafter make a unilateral filing with FERC pursuant to Sections 205 and 206 of the FPA, respectively.

### **4.3 SCHEDULE 4 - ENERGY IMBALANCE SERVICE**

#### **A. Eligibility Requirements**

The following eligibility requirements apply for the self-supply or third-party supply of Schedule 4 - Energy Imbalance Service

1. The specific Network Loads for which the service is to be provided must be the total Network Load obligation within the PacifiCorp Balancing Authority Area and have observable real-time metering and telemetry.
2. The resources providing the service must be located in the same PacifiCorp Balancing Authority Area as the Network Load and must have observable real time metering.
3. The resource providing the service must be deliverable resources as defined by a current transmission service agreement or resources that are interconnected to PacifiCorp's system and have an active generation interconnection agreement with PacifiCorp.
4. The capacity used for this service must be dedicated to Network Load service requirements and may not being used to satisfy any other capacity obligations.

5. The resource (or a resource dispatch center) must have a point of contact that is available any time the resource is designated for regulation and frequency response service.

6. The Transmission Customer must designate adequate resources to satisfy the Network Load obligation at all times. The designated resources must be under automatic generation control, satisfying all reserve requirements in real time and as required to compensate for instantaneous load swings or generation losses within the PacifiCorp BAA. The Transmission Provider reserves the right to determine the quantity and location of resources placed under AGC within the PacifiCorp BAA.

#### **B. Resources Moved Electronically to External Balancing Authority**

If the metered Network Load requiring imbalance service has been moved electronically into an External Balancing Authority, certified by NERC or its successor organization, by means of a pseudo-tie, this Section B shall apply.

1. The pseudo-tie requires identification and observable real-time metering of the specific Network Loads for which the service is to be provided. PacifiCorp requires a letter in advance from the External Balancing Authority which certifies that this service is supplied in accordance with all current policies and guidelines of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Ancillary Services to loads that are located physically in an External Balancing Authority Area.

2. PacifiCorp will accept, in lieu of the showing required in Section A.1 above, a letter in advance from the External Balancing Authority which certifies that this service is supplied in accordance with all current policies and guides of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Ancillary Services to loads that are physically located in an External Balancing Authority Area.

3. Whenever the pseudo-tie equipment providing the Network Load's data to PacifiCorp or the External Balancing Authority is not used or not useable, the dispatcher for the entity that is not receiving the load

signal shall immediately contact the dispatcher for the other entity to inform it of the loss of the signal. Thereafter, until both entities are again receiving the load signal through the pseudo-tie equipment, the Transmission Customer should provide fixed schedules from the External Balancing Authority each hour to minimize the impact of load imbalance.

4. If the External Balancing Authority or the supplier of imbalance service fails to meet the requirements set forth in Section B.2 (i.e., fails to notify PacifiCorp of the External Balancing Authority's loss of its ability to receive the Network Load's signal or fails to supply fixed schedule adjustments when called upon by PacifiCorp), PacifiCorp reserves the right to bill the Transmission Customer for this service for the duration of the failure, including reimbursement for any penalties according to Schedules 4 or 9 in the PacifiCorp OATT, charges or other consequences which PacifiCorp is subject to, related to the failure.

5. PacifiCorp reserves the right to request more information from the External Balancing Authority or the Network Load's supplier of imbalance service, in addition to the above referenced letter, to ensure that this service is supplied in a reliable manner. Further, PacifiCorp reserves the right to reject the request to self-supply or third-party supply such service, in the event that PacifiCorp, in its reasonable judgment, concludes that such self-supply or third-party purchase would impair reliability in the relevant PacifiCorp BAA or the interconnected system. PacifiCorp also reserves the right to terminate the self-supply or third-party supply if, in its reasonable judgment, PacifiCorp concludes that such self-supply or third-party supply is impairing reliability in the relevant PacifiCorp Balancing Authority Area or the interconnected system.

#### **4.4 SCHEDULE 9 - GENERATOR IMBALANCE SERVICE**

##### **A. Self-Supply Under Schedule 3 Entities**

For load serving entities who have certified as a self-supply entity for regulation and frequency response service (Schedule 3) under the requirements of this Attachment U and request generator imbalance self-certification, this Section A shall apply. Generator Imbalance Service may be self-supplied from Resources or undesignated Network Resources located within the PacifiCorp BAA under the limited set of conditions defined



below. Self-supply of Generator Imbalance service created by fixed point-to-point schedules can only be provided for resources located in the PacifiCorp BAA.

The following information will be required to demonstrate that the self-supply of generator imbalance service created by point-to-point schedules during generator derates or unit tripping:

1. The resources providing the service must have observable real time metering. In addition, PacifiCorp will define specific OASIS scheduling points of receipt which will apply to Customer's requesting self-supply. Customers will be obligated to demonstrate self-supply from these specific OASIS points of receipt within the PacifiCorp BAA for purposes of this section. The current list of OASIS points of receipt for section is ("PACE", "PACEW", and "PACW"). PacifiCorp reserves the right to modify this list without notice as required to maintain transmission system reliability and compliance with the PacifiCorp OATT.
2. Documentation that the resources are deliverable Resources or Network Resources and are defined by a current Network Integration Transmission Service Agreement, interconnection agreement, or legacy load service agreement on file at FERC.
3. Any Network Resources used to supply point-to-point imbalance service must be undesignated according to the PacifiCorp business practice, "Termination of Network Resources", consistent with section 30.3 of the PacifiCorp OATT. The resources utilized must be undesignated from within specified OASIS points of receipt to self-supply point-to-point transactions originating from that particular point of receipt.
4. Resources or undesignated Network Resources must be on-line, spinning, and responsive to the loss of another undesignated unit.
5. The hourly quantity of resources or undesignated Network Resources with a point of receipt plus the purchases made and delivered on point-to-point service into each PacifiCorp point of receipt must exceed the total quantity of point-to-point transactions exiting the defined point of receipt and PacifiCorp BAA for each hour.
6. Adequate resources must remain 'designated' and available for load service as required to satisfy the

Customer's Network Load obligation at all times during any period of point-to-point self-supply.

7. The party claiming generation imbalance self-supply must be previously certified as self-providing, or purchasing from third parties, regulation and frequency response service (Schedule 3) as specified in this Attachment U.

8. A point of contact is always available, all hours, every day to be used to call on resources necessary for load coverage.

#### **B. Resources Moved Electronically to External Balancing Authority**

If the Resource requiring imbalance service has been moved electronically into an External Balancing Authority Area, certified by NERC or its successor organization, by means of a pseudo-tie, this Section B shall apply. The point-to-point transmission service for the pseudo-tie resource will be established. Intra-hour transfers and the associated transmission service provided will be defined as the instantaneous output of the resource, therefore imbalance will be deemed to be self-supplied. End of hour true-ups of actual hourly integrated values are required for Balancing Authority Area energy accounting purposes.

1. The pseudo-tie requires identification and observable real-time metering of the specific Resource for which the service is to be provided. PacifiCorp requires a letter in advance from the External Balancing Authority which certifies that this service is supplied in accordance with all current policies and guidelines of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Ancillary Services to loads that are located physically in another Balancing Authority Area.

2. PacifiCorp will accept, in lieu of the showing required in Section A.1 above, a letter in advance from the External Balancing Authority which certifies that this service is supplied in accordance with all current policies and guides of the NERC Operating Manual, NERC Reliability Standards, or NAESB standards, or any successor manual or standards, that apply to supplying Ancillary Services to resources that are electronically transferred into another Balancing Authority.

3. Whenever the pseudo-tie equipment providing the Resource's data to PacifiCorp or the External Balancing Authority is not used or not useable, the dispatcher for the entity that is not receiving the load signal shall immediately contact the dispatcher for the other entity to inform it of the loss of the signal. Thereafter, until both entities are again receiving the load signal through the pseudo-tie equipment, the Transmission Customer should provide fixed schedules from the External Balancing Authority each hour to minimize the impact of generator imbalance.