

**COMMENTS OF IDAHO POWER COMPANY
ON CAISO'S DRAFT SETTLEMENTS AND BILLING
BUSINESS PRACTICE MANUAL CHANGES
PRR 1185**

Submitted By	Company	Date Submitted
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Idaho Power Company ("Idaho Power") appreciates the opportunity to comment on the California Independent System Operator's ("CAISO") draft Settlements and Billing Business Practice Manual ("BPM") changes as reflected in PRR 1185. These changes reflect CAISO's decisions in the Real-Time Market Neutrality Settlement initiative.

Idaho Power supports the proposed changes generally. However, there appears to be an error in the file titled "BPM – CG CC 64770 Real Time Imbalance Energy Offset EIM_5.2.doc" related to the FMM GHG price that will be used in the calculation. Specifically, in section 3.7, listing the outputs, item 16, "BAA15MFMMGHGPrice" is defined as "Balancing Authority Area Average FMM Marginal Greenhouse Gas Price". As we understand CAISO's 9/19/19 response to APS's/ 9/18/19 comments on this BPM, this should reflect a single Greenhouse Gas price per Balancing Authority Area.¹ Idaho Power believes the description for item 16 should be "Balancing Authority Area FMM Marginal Greenhouse Gas Price."

¹ See PRR 1185 details at <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1185&IsDlg=0>.

In addition, we do not see that “BAARTDGHGPrice” is listed or described in the table showing outputs in section 3.7. Idaho Power believes it should be and requests CAISO add it to that list and define it.

Idaho Power appreciates the opportunity to comment on the recommended BPM changes and appreciates CAISO’s work on these issues.