

# April 2024 Demand Response Request

For stakeholders to not incur additional costs for demand response participation within the market as well as to provide some more near-term changes, PacifiCorp would like to amend its previous submission and request for the CAISO to consider the following improvements and evaluate them for feasibility:

1. It is our current understanding that the PDR baseline methodologies are included in the CAISO tariff which makes changes or additions to the filed baseline methodologies difficult. Instead of overhauling and/or redoing a formal baseline study, PacifiCorp would like the CAISO to opine on the viability of moving the baseline methodologies from the tariff into the CAISO's business practice manuals. This would provide more flexibility for new baseline methodologies to be added and/or evaluated for consideration and approval. In light of the purpose of baselines, it might be necessary to create evaluation criteria for the CAISO and stakeholders to evaluate new baseline methodologies proposed by stakeholders. PacifiCorp considers this approach as a possible way to create more flexibility for additional baseline methodologies to be evaluated, and if deemed acceptable, to get approved for usage under PDR.
2. PacifiCorp requests operational enhancements to the current submission process for demand response programs as a load modifier. The current work around process requires participants to communicate to the CAISO when they wish to use their demand response programs as a load modifier in real-time via email. Additionally, it is impractical to submit load forecast adjustments for multiple demand response programs with the anticipated increase in demand response programs are likely on the horizon leaving the current work around to not be scalable. A potential enhancement could be the possibility of utilizing base scheduling. For example, if the forecast MW response changes as the operating hour approaches, WEIM participants could adjust their base schedules to reflect the updated forecast instead of the CAISO adjusting the load forecast each time a participant wanted to change the forecast response MW.