



# Memorandum

**To:** ISO Board of Governors

**From:** Roger Collanton, Vice President, General Counsel, and Corporate Secretary

**Date:** September 15, 2021

**Re:** **Decision on consent agenda**

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***This memorandum requires Board action.***

Pursuant to the ISO bylaws and the Charter for Energy Imbalance Market Governance, the EIM Governing Body has primary authority, as delegated by the Board of Governors, over changes to market rules that are specific to the energy imbalance market. The Charter specifies that such market rules changes first go to the EIM Governing Body for approval, and then to the Board for approval via consent agenda. In its general session meeting on September 8, 2021, the EIM Governing Body took the following action that is subject to Board approval via consent agenda:

- Approved, in a 5-0 vote, Management's proposal for a new category of western energy imbalance market (EIM) market participant, the "EIM sub-entity," which allows utilities located within a balancing authority area controlled by a separate EIM entity to financially settle load and non-participating resource imbalance energy directly with the ISO, instead of the EIM entity, and allows EIM sub-entities to submit base schedules directly to the ISO and, subject to each EIM entity's rules, to potentially submit forecast, outage and network model information directly to the ISO.

Management proposes the following motion:

***Moved, that the Board of Governors approves the September 22, 2021, consent agenda to create the market participant category of western energy imbalance market sub-entity; and***

***Moved, that the Board of Governors authorizes Management to make all necessary and appropriate filings with the Federal Energy Regulatory Commission to implement the proposal described in Management's memoranda to the EIM Governing Body dated September 1, 2021, including any filings that implement the overarching initiative policies but contain discrete revisions to***

***incorporate Commission guidance in any initial ruling on the proposed tariff amendment.***

Management's memorandum to the EIM Governing Body detailing the proposal and the EIM Governing Body's corresponding motions approving the proposal are included as Attachment 1.