



Northwest Public Power Association

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September 16, 2015

VIA EMAIL

Board of Governors  
California Independent Systems Operator Corporation  
250 Outcropping Way  
P.O. Box 639014  
Folsom, CA 95763-9014

**Re: NWPPA Comments on the EIM Long-Term Governance Proposal**

Dear Chairman Maullin and Board:

Thank you for the opportunity to provide comments on behalf of Northwest Public Power Association's (NWPPA) members in California as well as adjacent states who may be impacted by the governance of the Energy Imbalance Market ("EIM") proposal to be presented to the CAISO Board of Governors for consideration on September 17, 2015.

NWPPA is an international association representing over 140 public power consumer-owned utilities in the Western United States and Canada with approximately 300 associate members who provide goods and services to NWPPA public power members. In the United States, our public power members include public/people's utility districts, electric cooperatives and municipalities in California, Idaho, Montana, Nevada, Oregon, Washington and Alaska. These utilities serve approximately 5 million customers on a not-for-profit basis.

The Transitional Committee ("Committee") has undertaken an extensive process over many months to arrive at the current proposal before you. While not every issue that was raised by the public power community was accommodated, the Committee has attempted to be responsive to stakeholder concerns and fashioned an approach that should serve the EIM in its formative stages as wholesale markets in the West continue to evolve.

NWPPA is most specifically supportive of the Regional Issues Forum, which recognizes the important impact that the EIM may have on entities who are outside of the CAISO EIM footprint, such as neighboring balancing authorities, who may be impacted at interties and who have a keen interest in the CAISO EIM policies and operations.

Publicly-owned utilities have distinct interests that may not be adequately represented through a traditional stakeholder role. The Regional Issues Forum offers at least some real opportunity to be engaged and work to address issues as they arise.

NWPPA urges the Board to approve the proposed EIM governance proposal so long as the Regional Issues Forum remains solidly in place.

Thank you for your consideration.

Sincerely,



Anita J. Decker  
Executive Director

cc: Mr. Stephen Berberich, President and CEO CAISO (email)  
Ms. Rebecca Wagner, Public Utilities Commission of Nevada, (email)