



Valley Electric Association, Inc.

A Touchstone Energy® Cooperative 

**Valley Electric Association, Inc.
Comments on EIM Governance Proposal (August 13, 2013 Draft)**

September 6, 2013

Valley Electric Association, Inc. (VEA) supports the efforts of the California Independent System Operator Corporation (CAISO) to develop an energy imbalance market (EIM) in the Western Interconnection. VEA submits the following comments on the CAISO Governance Proposal, dated August 13, 2013.

VEA supports the creation of the Transitional Committee, to advise the CAISO Board on EIM implementation, as well as to propose a path to a long-term independent EIM governance structure. In order to ensure meaningful participation in the EIM, VEA believes that it is important to establish an independent EIM governance structure.

VEA supports the proposed sector approach to nomination of members of the Transitional Committee; however, VEA would like to clarify that the “publically owned utilities” sector includes member owned electric cooperatives, like VEA.

VEA supports the requirement of geographic diversity for Transitional Committee members; however, the candidate also should have a nexus with the CAISO market. In addition, VEA proposes that the CAISO consider requiring that at least one member of the Transitional Committee be from Nevada. Nevada will likely play a key geographic role in the development of an EIM market, since it lies between the eastern system of PacifiCorp and the CAISO Grid. In addition, the CAISO Grid now extends into Nevada as a result of VEA becoming a CAISO PTO, which is the only expansion of the CAISO Grid outside of California. Given the interests of Nevada in the development of an EIM market, it is important that Nevada be represented on the Transitional Committee.

VEA appreciates the opportunity to submit these comments and looks forward to continuing to participate in the CAISO’s EIM stakeholder process.