



Department of Energy

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**California ISO EIM Governance Review
Governance Review Committee Charter Draft Final Proposal
May 21, 2019
Bonneville Power Administration Comments**

Submitted by	Entity	Date Submitted
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The Bonneville Power Administration (Bonneville) appreciates the opportunity to comment on the ISO's recent May 21, 2019 publication of its Energy Imbalance Market (EIM) Governance Review Committee Charter Draft Final Proposal (Proposal). Bonneville is a federal power marketing administration (PMA) within the U.S. Department of Energy that markets electric power from 31 federal hydroelectric projects and some non-federal projects in the Pacific Northwest with a nameplate capacity of 22,500 MW. Bonneville currently supplies 30 percent of the power consumed in the Northwest. Bonneville also operates 15,000 miles of high voltage transmission that interconnects many transmission systems in the Northwest with each other and with Canada and California.

Bonneville supports the ISO's proposed structure and formation of the Governance Review Committee (GRC). In particular, Bonneville appreciates the ISO's revision to the sector classifications to include a Pending New EIM Participants sector. Because entities that fall within this sector would be actively evaluating the benefits of market participation, they, as well as the entities within their balancing authorities, have an important and distinct interest in the formation of the GRC and any resultant changes to the EIM governance structure. The revised sector classifications reflect a balanced and effective approach to grouping similarly situated entities while retaining the breadth of stakeholders necessary to form a diverse and inclusive GRC.

Bonneville expects that it would participate in the stakeholder nomination and candidate ranking process through the proposed Pending New EIM Participants sector. Bonneville also looks forward to working with the ISO to identify other entities that would qualify to participate under this stakeholder sector.

As described in prior comments, Bonneville believes that the unique interests of federal PMAs and Northwest public power merit direct representation on the GRC. These entities would provide a valuable perspective to the GRC given their unique geography, statutory obligations, customer and stakeholder profiles, transmission portfolios, and resource attributes. Therefore, Bonneville appreciates the ISO's effort to accommodate these interests, which aligns with the Proposal's mandate that the GRC "be geographically diverse and [] collectively reflect the broad range of stakeholder and industry sectors that are involved in the EIM."¹ By taking a comprehensive view of the interconnection's stakeholders, the GRC process will be better equipped to deliver a proposal that enhances the durability, independence, and diversity of the EIM governance structure. Bonneville believes that these types of governance changes will significantly improve the long-term viability of the EIM.

Bonneville appreciates the ISO's consideration of these comments and reiterates its support of advancing the formation of the GRC and the subsequent EIM governance review initiatives in an expeditious manner.

¹ CAISO, *EIM Governance Review Committee Draft Final Proposal*, p. 2 (May 21, 2019).