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**Comments  
of the  
California Municipal Utilities Association (CMUA)**

*EIM Governance Review  
Draft Final Proposal for Formation of an  
EIM Governance Review Committee*

The California Municipal Utilities Association appreciates the opportunity to submit these comments on the Draft Final Proposal to form a Governance Review Committee (GRC or Committee) to make recommendations on changes to Energy Imbalance Market (EIM). CMUA submitted earlier comments on the Straw Proposal.

Overall, CMUA supports the Draft Final Proposal and urges its adoption at the upcoming joint meeting of the California Independent System Operator Corporation (CAISO) Board of Governors and EIM Governing Body meeting on June 28, 2019.

As noted in its earlier comments, CMUA supports the overall concept to form a GRC along the lines of the Transitional Committee to make governance reform recommendations for the EIM and/or any changes that may be necessary to governance if the CAISO moves forward with an Extended Day Ahead Market (EDAM). We appreciate the CAISO's efforts to reflect earlier comments by CMUA and others to make certain changes from the Straw Proposal, particularly in the area of publicly-owned utility sector classification. We further support the intent reflected in both the Straw and Draft Final Proposals to ensure diversity of representation across the GRC. Perfection with respect to the written rules for composition of the GRC is not achievable given the multiplicity of interests of stakeholders. However, as we stated in our earlier comments, CMUA supports the ultimate discretion of the Board of Governors and Governing Body to comprise the Committee to meet the objectives stated in the Draft Charter.

Again, as CMUA stated earlier, is critical that the Committee adequately reflects both California and non-California perspectives. As EIM grows, it is tempting to focus on those areas of growth and forget that California remains a significant portion of the load served within the market footprint. EDAM will not be a success without full buy-in from California stakeholders and policy makers, and those views require appropriate representation on the Committee.