

Stakeholder Comments to the July 31, 2020 Straw Proposal and corresponding section in December 14, 2020 Revised Straw Proposal

Comment Areas	Stakeholder Comments	RSP Section
Issue 1: Delegation of Authority for Market Rules to the Governing Body and the Decisional Classification Process	AWEA, BOSR, BPA, CMUA, Chelan, CPUC ED, CPUC PAO, Joint EIM Entities, NRU, PG&E, PGP, PIO, PPC, Six Cities, SCE, WAPA	
<i>Issue 1: Scope of Delegation to the Governing Body</i>	Chelan supports extending the Governing Body’s scope of authority to cover all real-time market rules in the context of EIM, and all real-time and day-ahead market rules in the context of EDAM.	RSP Section III, Issue 1B and 1C
	PPC supports expanding the delegated authority for the Governing Body to include all real-time and day-ahead issues as well as issues that impact all CAISO market participants. PPC also supports the extension of this expanded delegated authority to the Governing Body for all EDAM market design issues.	RSP Section III, Issue 1B and 1C
	SCE supports the recommendation to implement any approved governance changes specific to the EIM-only rather than delay implementation until approval of the EDAM market design.	RSP Section III, Issue 1B
<i>Issue 1: Type of Shared Authority</i>	Bonneville notes that the GRC’s proposal to move to a Joint Authority model will largely moot the decisional classification issue as Joint Authority model creates a “bright line” in defining the Governing Body’s approval authority. However, if the GRC modifies its Joint Authority proposal in response to comments, and the decisional classification therefore becomes more important, Bonneville believes the decisional classification issue will need to be revisited. In the case of a tie-breaker, Bonneville supports the second option, which alternates authority between the chairs of the two bodies.	RSP Section III, Issue 1B and 1C
	PG&E supports the use of a “bright line” test for decisional classification, which needs to be more clearly spelled out in the next Straw Proposal iteration. PG&E recommends the GRC designate a working group or sub-committee of stakeholders that would carefully go through the entire tariff and propose a definitive mapping for the bright line test.	RSP Section III, Issue 1C

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<i>Issue 1: Type of Shared Authority</i>	AWEA generally supports the proposed “joint authority” model and the enhanced durability of the delegation of authority.	RSP Section III, Issue 1B and 1C
	Bonneville supports the GRC’s recommendation for Joint Authority between the Board and the Governing Body.	RSP Section III, Issue 1B and 1C
	CMUA supports the way in which the move to Joint Authority, the expansion of authority of the Governing Body, and the proposed durability, fit into a comprehensive whole.	RSP Section III, Issue 1B and 1C
	Chelan agrees a continued practice of joint decision-making and deliberation should generally result in increased collaboration, cohesion and common understanding between the two bodies. Chelan considers the joint authority approach to be an acceptable compromise.	RSP Section III, Issue 1B and 1C
	As it is not yet clear whether EDAM will move forward, CPUC Energy Division staff recommends no changes to the current delegation of authority model.	RSP Section III, Issue 1B
	The CPUC Public Advocates Office opposes the proposed joint authority model because it implies that equal mandatory system participation rules apply to the EIM entities, that they have equal responsibility for grid management charges, and because the Governing Body and the Board meetings provide reasonable opportunities for collaboration on a regular basis.	RSP Section III, Issue 1B and 1C
	NRU recommends the Governing Body have joint authority over all real-time market issues, which should be granted when the governance review process is complete. The joint authority should be expanded to the extended day-ahead market if/when such a market is established.	RSP Section III, Issue 1B and 1C

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<p><i>Issue 1: Type of Shared Authority</i></p>	<p>PGP supports the recommendation that the Governing Body be granted joint authority over all real-time market rules and this authority should be granted when the governance review is complete, which may be prior to EDAM market design approval and implementation and EDAM governance changes.</p>	<p>RSP Section III, Issue 1B and 1C</p>
	<p>PIOs support the GRC’s proposal to substantially expand the scope of authority that the Governing Body currently holds for EIM and broadly define the authority for EDAM, while also moving to a joint authority model for the decisions that fall within the Governing Body’s expanded authority.</p>	<p>RSP Section III, Issue 1B and 1C</p>
	<p>The Six Cities specifically support the GRC’s proposal for joint decisional authority for the Governing Body and the Board for changes to market design or market rules that affect the Real-Time Markets and, if the Extended Day-Ahead Market is implemented, the Day-Ahead Market as well.</p>	<p>RSP Section III, Issue 1B and 1C</p>
	<p>SCE does not support the joint authority model for the Board and the Governing Body. Such a sharing of authority fails to account for the fundamental difference between CAISO market participants and EIM members. The Board should continue to have primary, not shared, authority for the day-ahead market (DAM), including the expanded day-ahead market to the extent the elements impact the processes and mechanisms involved in the DAM in California, and real-time market (RTM) matters which apply to California.</p>	<p>RSP Section III, Issue 1C</p>
	<p>The BOSR supports the GRC’s recommendation for joint authority between the Governing Body and Board over: all proposed changes to the real-time market design or market rules; all aspects of the EDAM Initiative; and, if EDAM is implemented, all proposed changes to the day-ahead market design or market rules.</p>	<p>RSP Section III, Issue 1B and 1C</p>

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<p><i>Issue 1: Other Issues Relating to the Delegation of Authority</i></p>	<p>Chelan believes maintaining the practice that the Board Chair serve as the tiebreaking vote in the event of disagreement between the Board and the Governing Body on decisional classification does not align with the spirit of “joint authority.” Chelan believes alternating the tiebreaker role between the Board Chair and the Governing Body Chair is the most consistent with the concept of joint authority, but is an imperfect solution. Chelan recommends the GRC consider the option of having the decisional classification default to “joint authority” in the event of an unresolvable dispute on classification between the Governing Body and Board.</p>	<p>RSP Section III, Issue 1D</p>
	<p>PG&E is not yet fully supportive of the proposed tiebreaker model for resolving disputes, following a split vote (and up to two retries). PG&E believes this approach merely “kicks the can” and entrusts to FERC to find a resolution of contested issues when regional parties are unable to do so themselves.</p>	<p>RSP Section III, Issue 1D</p>
	<p>PGP recommends that the existing dispute resolution process for decisional classification be retained, with the exception of the tie-breaker rule. In that event of a dispute between the Governing Body and Board on decisional classification that results in a tie, PGP recommends the tie-breaker authority alternate between the chairs of the two bodies.</p>	<p>RSP Section III, Issue 1D</p>
	<p>PIOs recommend that where disputes arise in the decisional classification process, the tiebreaker authority should be allowed to alternate between the chairs of both boards over time.</p>	<p>RSP Section III, Issue 1D</p>
	<p>PPC agrees that it is less likely to have disputes on decisional classification under the new proposal, but in the case of such a dispute, does not believe it is appropriate for the Board chair to make the sole determination. PPC believes the potential to alternate the tie breaker between the Chairs of the two bodies is an imperfect, but acceptable solution. PPC supports the GRC’s proposed resolution process in the case of decision deadlocks. However, PPC believes the proposed dispute resolution does not work if one entity is seeking a change from the proposal while another seeks to maintain the status quo. It will be important that an alternative solution is developed to address these instances.</p>	<p>Revised Straw Proposal Section III, Issue 1D</p>

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<p><i>Issue 1: Other Issues Relating to the Delegation of Authority</i></p>	<p>WAPA believes the proposed element for dispute resolution, where two competing proposals are submitted to FERC for resolution, creates uncertainty, delays, and extra expenses.</p>	<p>RSP Section III, Issue 1D</p>
	<p>The BOSR generally supports the dispute resolution mechanism recommended if only one body approves a proposal, i.e., there is a deadlock. The BOSR supports the GRC’s recommendation for two attempts to reach agreement before filing two options with the FERC.</p>	<p>RSP Section III, Issue 1D</p>
	<p>Chelan supports the general process outlined by the GRC for resolving deadlock. Chelan recommends that if the bodies do not reach agreement after two rounds, then either body could trigger the process for CAISO management moving forward with filing alternative proposals with FERC. For both proposals to be on equal footing in front of FERC, the Governing Body will need to be empowered to manage the presentation of its preferred alternative. Multiple procedural mechanisms may be available to ensure this will occur. One idea is to include the Governing Body’s comments as part of the CAISO filing (and any subsequent answers).</p>	<p>RSP Section III, Issue 1D</p>
	<p>The Joint EIM entities believe that by not providing a dispute resolution path, the GRC would essentially be giving the Governing Body and the Board veto power over market improvements. The EIM Entities appreciate the need to include a dispute resolution process as part of the final proposal and agree that, if there is no agreement, the initiative should be taken back to stakeholders to explore ways to address the identified concerns and to establish a revised proposal for the two bodies to consider. If, however, in this second attempt the Governing Body and the Board are still deadlocked, the EIM Entities recommend proceeding with the dual filings at FERC.</p>	<p>RSP Section III, Issue 1D</p>

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<p><i>Issue 1: Other Issues Relating to the Delegation of Authority</i></p>	<p>PIOs support the proposed process for resolving potential deadlocks under the joint authority model, but caution the routine use of competing FERC filings due to the uncertainty and risk such filings can create. To reduce the need for competing FERC filings, PIOs recommend the GRC consider adding the following requirement – that in its own filing, the Board describe the Governing Body’s competing proposal in adequate detail to enable a fair determination by FERC and also, sufficiently justify its reasoning for failing to adopt the Governing Body’s alternative.</p>	<p>RSP Section III, Issue 1D</p>
	<p>The Six Cities do not object to the concept of submitting alternative proposals to FERC, as described in the Straw Proposal. If, however, the Board determines that a revision of market rules is necessary, but the Governing Body desires to preserve the status quo, the Board must retain authority to submit the revision it proposes pursuant to Section 205 of the Federal Power Act and applicable rules and principles thereunder, with the Governing Body retaining authority to protest the revision.</p>	<p>RSP Section III, Issue 1D</p>
	<p>SCE does not support the dispute resolution proposal for submission of dual proposals at FERC when a deadlock in voting occurs between the Board and Governing Body. In the specific case of deadlock in the decisional classification process, SCE supports the approach applied to the delegation of authority with the Chair of the Board making the decision for all matters except those specific to or originating within the EIM. This approach can be extended to EDAM as well.</p>	<p>RSP Section III, Issue 1D</p>
	<p>Chelan believes that of the options listed in the straw proposal, alternating approval between the Governing Body and Board is most consistent with the concept of joint authority. Chelan recommends the GRC also consider the option of requiring approval from both the Governing Body Chair and Board Chair. Regardless of the approval mechanism, Chelan recommends changing the maximum term for any such amendment to one week but also requiring that the full Governing Body and Board be convened as soon as possible after adoption of the temporary tariff amendment, but no later than one week, to consider whether to proceed with extending the amendment or pursue a different solution. Chelan also recommends further definition around what constitutes "exigent circumstances."</p>	<p>RSP Section III, Issue 1D</p>

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<p><i>Issue 1: Other Issues Relating to the Delegation of Authority</i></p>	<p>PGP supports retaining an exigent circumstances provision that would ensure the process of assembling both the Board and Governing Body quickly for a vote does not delay temporary action that is needed to prevent market manipulation or preserve reliability. As an alternative to alternating responsibility for approving an exigent circumstance filing, PGP suggests consideration of an option where both the chair of the Governing Body and Board must approve the filing.</p>	<p>RSP Section III, Issue 1D</p>
	<p>PIOs recommend that CAISO only move forward with emergency filings after obtaining Board approval. Where the tariff change involves a matter of joint authority, CAISO should strive to obtain approval from both the Governing Body and the Board. For tariff matters where joint authority is implicated but where both boards cannot be timely convened, PIOs support CAISO management obtaining approval from only one board – whichever board can be more readily convened.</p>	<p>RSP Section III, Issue 1D</p>
	<p>PPC suggests that for exigent circumstances, the CAISO should, to the extent possible, seek the approval of both bodies.</p>	<p>RSP Section III, Issue 1D</p>
	<p>SCE supports the provision for exigent circumstances that permits CAISO to seek approval from one of the bodies prior to filing the emergency change to the tariff.</p>	<p>RSP Section III, Issue 1D</p>
<p><i>Issue 1: Enhancements to the Durability of the Delegation of Authority</i></p>	<p>Bonneville urges the GRC to recommend that any changes to the delegation of authority require unanimous approval by the Board and the Governing Body. Funding for the Governing Body should be established as a renewing fixed commitment and not rely on a broader budgeting process. Bonneville suggests that the effective date for changes to charter revisions be the amount of time required for market participants to give notice and withdraw from the market, plus 90 days.</p>	<p>RSP Section III, Issue 1E</p>

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<p><i>Issue 1: Enhancements to the Durability of the Delegation of Authority</i></p>	<p>Chelan recommends adding additional protection for the durability of the Governing Body’s delegated authority in the form of a dispute resolution mechanism that could provide the Governing Body and Board two attempts to reach agreement on a governance change. If during that second attempt the Board does not secure Governing Body advisory opinion support, the Board would be able to move forward (subject to the unanimous vote and notice requirements) upon receiving an affirmative declaration from FERC that the proposed change meets the independence standards. Chelan supports including a mandatory notice period for implementing governance changes that aligns with any notice period EIM or EDAM entities have for withdrawing from the market. Chelan recommends the GRC consider additional protections to ensure the Governing Body cannot be functionally nullified, for example by having its funding, or its discretion over that funding, eliminated.</p>	<p>RSP Section III, Issue 1E</p>
	<p>The EIM Entities support the proposed durability measures.</p>	<p>RSP Section III, Issue 1E</p>
	<p>NRU supports the enhancements to the durability of delegated authority to the Governing Body.</p>	<p>RSP Section III, Issue 1E</p>
	<p>PG&E understands that tying the “durability” of the delegation of authority to the 180-day withdrawal notice period, as laid out in the Straw Proposal, is a good faith effort to strike the right balance in this regard. However PG&E believes this provision would not be enough under extreme circumstances. The proposal should allow for the possibility that under specified emergency conditions, an interim rescission of the delegated authority may need to be effectuated immediately, in order to avoid enormous financial harm or reliability impacts accruing to California customers.</p>	<p>RSP Section III, Issue 1E</p>
	<p>PGP recommends consideration of a dispute resolution mechanism for governance changes to augment the durability measures proposed in the Straw Proposal. Lastly, PGP recommends commitment to Governing Body funding levels to fully execute its responsibilities, including sufficient funding for the outside market expert.</p>	<p>RSP Section III, Issue 1E</p>

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<p><i>Issue 1: Enhancements to the Durability of the Delegation of Authority</i></p>	<p>PIOs support the GRC’s proposal to enhance the durability of the delegation of authority to the Governing Body by doing the following: requiring a unanimous vote of the Board for any changes to governance that may impact any aspect of the scope or type of the Governing Body’s authority; verifying no changes should be adopted without first seeking stakeholder input and specifically considering and addressing any advisory input from the Governing Body, the Regional Issues Forum, or the BOSR may provide; and requiring a mandatory notice period for implementing any proposed change that is equal in length to any notice period that EIM or EDAM entities may have for withdrawing from the EIM or EDAM market (i.e., a 180-day notice period for EIM). PIOs suggest that this notice period would apply to all changes to the delegation of authority unless both the Board and the Governing Body unanimously agree to waive the notice period.</p>	<p>RSP Section III, Issue 1E</p>
	<p>PPC strongly supports the GRC’s proposed changes to the durability of delegated authority to the Governing Body as an improvement to the status quo. The current proposal to align this notice period with the required withdrawal notice from the market may not provide sufficient time for entities to consider withdrawal and give notice in a timely manner, and PPC recommends extending the notice period by at least 30 days to provide additional time for entities to consider the impacts of the governance change and determine whether to trigger their withdrawal notice.</p>	<p>RSP Section III, Issue 1E</p>
	<p>SCE supports retention of the current provisions for the scope and type of delegation as governed by the EIM Charter and supported by the corporate bylaws of the CAISO, respectively. SCE has no objection to a unanimous vote requirement for changes to the scope and type of authority; and supports the proposal for stakeholder input on the type of delegation. However, SCE does not support similar actions for changes to the scope of delegation if those changes undermine the CAISO’s bylaws. SCE supports a mandatory notice period of 180 days for EIM-only governance changes which is consistent with the required period for withdrawal from the EIM. Also, SCE reiterates that any changes to the scope and type of delegation applicable to the existence of EDAM must be revoked immediately if EDAM does not materialize or ceases to exist after implementation.</p>	<p>RSP Section III, Issue 1E</p>

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<i>Issue 1: Enhancements to the Durability of the Delegation of Authority</i>	WAPA supports using the following language "Any changes to the EIM governance must be approved by a vote of at least 75% of both the Board and the Governing Body." In the event of a tie, WAPA supports the alternative of randomly selecting the largest potential odd numbered subset of the members of the two bodies who would then decide by a super-majority vote.	RSP Section III, Issue 1E
Issue 2: Process and criteria for selecting governing body members	AWEA, BOSR, BPA, CMUA, CPUC ED, CPUC PAO, Joint EIM Entities, NRU, PG&E, GGP, PIO, PPC, Six Cities, SCE, WAPA	
<i>Issue 2: Process and criteria for selecting governing body members</i>	AWEA supports change to give public interest/consumer advocates a vote in the nominating committee. AWEA also supports specification of the diversity qualities that are being sought in selecting Governing Body members	RSP Section III, Issue 2B(i) and 2B(iii)
	Bonneville is supportive of the GRC’s recommendations regarding selection of Governing Body members. Specifically stating diversity selection criteria to encompass geographic background and experience are welcome additions to ensure a strong mix of perspectives on the Governing Body.	RSP Section III, Issue 2B(iii)
	CMUA recognizes the key contributions made by public interest organizations serving on the Nominating Committee in an advisory capacity, and supports the proposal to make them full voting members.	RSP Section III, Issue 2B(i)
	Chelan supports providing the Public Interest Groups and Consumer Advocates sector representative a voting role on the Governing Body nominating committee. Chelan supports expanding the Governing Body selection criteria to include social diversity in addition to professional and geographic diversity. Chelan also supports the GRC’s proposal to extend a Governing Body member’s term for 60-days in the event a replacement has not yet been confirmed, if requested by the nominating committee, approved by the Governing Body and agreed to by the sitting member.	RSP Section III, Issue 2B(ii) and 2B(iii)

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<p><i>Issue 2: Process and criteria for selecting governing body members</i></p>	<p>CPUC Energy Division staff believe the public interest and consumer advocate sector representative should have a voting role in this process. Energy Division staff support a more diversified Governing Body, and also recommends that the GRC add public interest expertise to the search criteria. Energy Division staff also find the proposed 60-day holdover period to be reasonable and is supportive of this recommendation</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>
	<p>The CPUC Public Advocates Office supports the proposal to provide the Public Interest Organization and Consumer Advocates Sector a voting seat. However, the Public Advocates Office requests information on how the voting will work with an even number (six instead of five) of voting members.</p>	<p>RSP Section III, Issue 2B(i)</p>
	<p>The CPUC Public Advocates Office supports a diverse membership in the Governing Body because, such diversity can bring to the Governing Body meetings, the perspective of consumers from different geographic backgrounds, ethnicities, and genders where the CAISO provides its services.</p>	<p>RSP Section III, Issue 2B(ii) and 2B(iii)</p>
	<p>The Joint EIM Entities do not oppose the recommendation to amend the selection policy so that the representative of public interest groups and consumer advocates becomes a voting member of the Nominating Committee.</p>	<p>RSP Section III, Issue 2B(i)</p>
	<p>The Joint EIM Entities support the proposed modifications to the selection criteria to emphasize diversity. In considering potential re-nominations, the Nominating Committee should evaluate which set of diverse qualities would best complement the remaining members and ask the executive search firm to identify at least two qualified candidates to interview, in addition to the sitting member.</p>	<p>RSP Section III, Issue 2B(iii)</p>
	<p>NRU supports the addition of language in the selection criteria to better establish diversity of representation, including geographic diversity, on the Governing Body.</p>	<p>RSP Section III, Issue 2B(iii)</p>
	<p>PG&E has no comments in this section and fully supports the GRC proposals.</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>

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<p><i>Issue 2: Process and criteria for selecting governing body members</i></p>	<p>PGP supports the GRC’s proposed enhancements to the selection of Governing Body members and supports implementing these for both EIM and EDAM.</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>
	<p>PIOs support the GRC’s recommended 60-day holdover period for Governing Body members where a replacement has not yet been confirmed. PIOs support the GRC’s recommendation to change the status of the representative of Public Interest Organizations and Consumer Advocate Groups on the EIM Nominating Committee from an advisory to a voting member. Lastly, PIOs support the GRC’s recommendation to enhance the role that diversity plays in the selection criteria for the Governing Body to include not only geographic diversity and diversity of expertise, but also diversity of gender, ethnicity and perspective.</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>
	<p>PPC has no objections to the proposed hold-over period for outgoing Governing Body members. PPC supports the PIO sector becoming a voting sector on the nominating committee and supports the inclusion of language in the selection criteria that would seek to establish a diversity of representation on the Body.</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>
	<p>The Six Cities generally support the recommended revisions to the nomination and selection process. With respect to the proposed addition of diversity in “perspective” as a criterion for evaluating diversity, it is not clear what qualities the term is intended to capture that are not already covered by the other measures of diversity. Without more substantive definition, the criterion for diversity of “perspective” does not seem to add meaningful guidance for the Committee.</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>
	<p>SCE supports the request for a 60-day holdover period on expiration of the term for a Governing Body member. SCE also supports the appointment of a representative with a voting role to the Nominating Committee for the public interest organizations/ consumer advocates rather than the current advisory role. Lastly, SCE supports enhancement of the current diversity criteria to include gender, ethnicity and perspective within the selection process for Governing Body members. Further, SCE offers support for the Nominating Committee to include language on diversity criteria to guide the search firm’s candidate selection process.</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>

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<p><i>Issue 2: Process and criteria for selecting governing body members</i></p>	<p>WAPA supports the Straw Proposal recommendations for selection of Governing Body members. However, WAPA believes there is an opportunity for more transparency and stakeholder involvement related to the Nominating Committee. To this end, WAPA seeks clarity and review of the selection, terms, and processes for the Nominating Committee.</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>
	<p>The BOSR generally supports all three recommendations.</p>	<p>RSP Section III, Issue 2B(i), 2B(ii), and 2B(iii)</p>
<p>Issue 3: Governing Body meetings and engagement with stakeholders</p>	<p>AWEA, BPA, BOSR, CMUA, Chelan, Joint EIM Entities, NRU, PG&E, PGP, PIO, PPC, PPU, SCE, WAPA</p>	
<p><i>Issue 3: Modifying the Regional Issues Forum (RIF)</i></p>	<p>AWEA supports the recommendation to enhance the Regional Issues Forum rather than creating a formal stakeholder committee.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>Bonneville supports the GRC’s proposed structure of a Modified RIF as an improved form of stakeholder engagement. Bonneville expects the Modified RIF will function as a fully independent body that will, among other things establish its own charter, have authority to develop and propose its own issues, provide a forum for knowledge exchange as well as for robust discussion of market issues, and communicate regularly and directly with the Governing Body and Board at joint meetings.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>BOSR strongly supports this recommendation, as it establishes an advisory committee that provides an avenue for market stakeholders to effectively engage with the CAISO and EIM governing bodies.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>CMUA also supports an augmented Regional Issues Forum as a vehicle for greater stakeholder engagement.</p>	<p>RSP Section III, Issue 3B(i)</p>

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<p><i>Issue 3: Modifying the Regional Issues Forum (RIF)</i></p>	<p>Chelan supports enabling the Regional Issues Forum to tackle issues that are part of an active CAISO-led stakeholder process. Chelan does not have a specific proposal for the process the RIF should follow to develop a recommendation and thinks it would be appropriate to allow the RIF to develop that process.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>The Joint EIM Entities agree with the GRC that the incremental augmentation of the role of the RIF is a logical step at this juncture. The EIM Entities propose the following sector definitions for greater specificity: EIM Entity, EIM Entity Participating Balancing Authority Area Transmission Owning Utility, PTO Transmission Owning Utility, IPP/Power Marketer, IPP/Power Marketer, Public Interest/Consumer Advocate, Public Interest/Consumer Advocate, California Publicly Owned Utility, External Publicly Owned Utility, and Neighboring BA.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>PG&E is neutral on allowing the RIF to address issues in active CAISO initiatives. RIF’s discussions will have to be managed carefully to avoid providing a platform for stakeholder advocacy and to ensure that the RIF does not become a surrogate or replacement for the formal stakeholder process. PG&E opposes having the RIF become a “super-stakeholder” that would attempt to impose or express a consensus to the governing bodies, at the expense of a full airing of dissenting minority views.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>PGP supports aligning the RIF’s liaison sectors to align with those used for the nominating committee.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>PGP supports the GRC proposal to modify the Regional Issues Forum by eliminating the limitation on the RIF to consider matters that are already part of an ongoing CAISO stakeholder process and replacing it with language that allows and encourages the RIF to discuss matters that are part of an ongoing stakeholder process and allows the RIF to offer written opinions or recommendations.</p>	<p>RSP Section III, Issue 3B(i)</p>

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<p><i>Issue 3: Modifying the Regional Issues Forum (RIF)</i></p>	<p>PIOs support the GRC’s recommendation to “formalize” the Regional Issues Forum by allowing the RIF to discuss matters that are part of an ongoing CAISO stakeholder process, and if warranted, to share consensus opinions with the Governing Body or with CAISO staff. PIOs also support modifying the Regional Issues Forum’s current stakeholder sectors, using the Nominating Committee’s stakeholder sector definitions as a model.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>PPC support the GRC’s proposal to modify the existing Regional Issues Forum and allow the RIF to operate much like a stakeholder advisory committee. PPC agrees that the changing market composition makes a review of current stakeholder segments on the RIF appropriate and also notes that it is likely appropriate that the sectors represented on the nominating committee should also be reviewed in light of market changes.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>Public Power supports the GRC’s proposal to enhance the RIF by both allowing and encouraging discussion of matters that are part of the ISO stakeholder process, which would enable the RIF to function as a SAC.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>SCE sees no reason for change to the sector classifications used for the selection of stakeholder liaisons for the RIF. As membership grows within the EIM and EDAM if it materializes, this matter should be revisited if the sectors or a subset of sectors no longer reflect the RIF’s membership. The sector for non-EIM BAAs not represented by any voting sector should remain unless the sector becomes empty and there is no further subscription. As the EIM footprint expands, there may be other neighboring balancing authority areas that become neighbors who may wish to participate in that sector.</p>	<p>RSP Section III, Issue 3B(i)</p>
	<p>SCE supports the current formation and responsibilities of the Regional Issues Forum and has no objection to an expanded role in the discussion of CAISO initiatives among its members for presentation as an advisory opinion to the Governing Body or within the CAISO stakeholder process. SCE opposes any formal voting process as both unneeded and counterproductive.</p>	<p>RSP Section III, Issue 3B(i)</p>

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Comment Areas	Stakeholder Comments	RSP Section
<p><i>Issue 3: Representation for Federal Power Marketing Agencies and Consumer-Owned Utilities</i></p>	<p>Bonneville is willing to work with the GRC recommendation, but prefers the liaisons to have voting roles. Bonneville would endeavor to work collaboratively with BOSR members to align BOSR goals and objectives with those of public power and the PMAs. Should the BOSR not ultimately propose inclusion of PMAs and public power within their committee, Bonneville will seek establishment of a separate stakeholder committee for their representation.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>CMUA supports an advisory liaison role for public power on the Body of State Regulators. As it relates to the specifics of the number of liaisons for public power on the BOSR, CMUA urges three, to be allocated to (1) Pacific Northwest public power entities; (2) California public power entities; and (3) Desert Southwest/Rocky Mountain public power entities. From a California perspective, CMUA notes that California entities are still not afforded the same optionality of market alternatives and participation as entities in other regions. Thus, it is essential that participation for California POUs is hardwired into the proposal.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>Chelan supports establishing consumer-owned utility and power marketing agency liaisons on the BOSR. There are numerous consumer-owned utilities across the West with diverse interests and Chelan recommends establishing a sufficient number of liaison positions for consumer-owned utilities to account for that diversity.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>The Joint EIM Entities do not oppose the GRC’s recommendation for Federal Power Marketing Agencies and Consumer-Owned Utilities, but believes the issue should be decided by BOSR.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>NRU supports the addition of consumer-owned utilities and PMAs as non-voting liaisons to the Body of State Regulators. In order to obtain sufficiently diverse representation, NRU recommends four liaisons: three from geographically diverse consumer-owned utilities and one PMA.</p>	<p>RSP Section III, Issue 3B(ii)</p>

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<p><i>Issue 3: Representation for Federal Power Marketing Agencies and Consumer-Owned Utilities</i></p>	<p>PGP supports the GRC recommendation to establish a liaison role for public power and power marketing agencies on the BOSR, and recommends a minimum of two public power representatives and one power marketing agency representative serve in liaison roles.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>PIOs support an advisory role for public power – i.e., consumer-owned utilities and federal PMAs – on the BOSR.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>In concept, PPC supports establishing public power and PMA liaisons to the Body of State Regulators. PPC also believes more than one liaison is necessary to represent the diverse interests of public power in the EDAM footprint and suggests three geographically diverse representatives and one PMA would be a good balance to gain diverse representation. PPC also suggests these liaisons should not be voting members of the BOSR, but to the extent that they disagree with positions taken by the BOSR the liaisons should be provided the opportunity to offer those opinions directly to the Governing Body for consideration.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>The Public Power Utilities are in agreement with and appreciate the recommendation for ex officio liaison positions on the BOSR for PMAs and consumer-owned utilities who participate in the EIM. Public Power recommends a sufficient number of liaison positions to capture that diversity, plus one PMA liaison.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>SCE is supportive of the federal power marketing agencies (PMA) being combined with the Body of State Regulators (BOSR) though it remains indifferent whether their participation within the BOSR is within an ex officio liaison capacity. SCE supports the proposal that the PMA be excluded from voting on matters exclusive to the BOSR though the PMA is allowed to participate in BOSR meetings and contribute a PMA/consumer-owned utility perspective to BOSR meetings.</p>	<p>RSP Section III, Issue 3B(ii)</p>
	<p>WAPA agrees with previous comments that voting roles for the PMAs and public power in general should be incorporated into the BOSR and/or a parallel entity such as a stakeholder advisory committee. WAPA does not agree that non-voting liaison roles on the BOSR as proposed by the GRC would be sufficient.</p>	<p>RSP Section III, Issue 3B(ii)</p>

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<p><i>Issue 3: Representation for Federal Power Marketing Agencies and Consumer-Owned Utilities</i></p>	<p>The BOSR supports the following: (1) Each liaison would be from an entity participating in the Western EIM; (2) One liaison would be from a power marketing administration and one would be from a publicly owned utility; and (3) The liaison would be a non-voting position. The liaisons would be invited to participate actively in BOSR meetings. The liaisons would not only be able to inform public power of BOSR positions and reasoning, but also provide the BOSR membership with public power’s perspective. The BOSR will collaborate with public power representatives and other stakeholders on the details of the selection process and other aspects of the liaison positions. The BOSR welcomes comments through this process on the details of integrating the potential liaison positions in the BOSR governance model.</p>	<p>RSP Section III, Issue 3B(ii)</p>
<p>Issue 4: other potential areas for governing body involvement</p>	<p>AWEA, BPA, BOSR CESA, CMUA, Chelan, CPUC ED, CPUC PAO, Joint EIM Entities, PG&E, PGP, PIO, PPC, PPU, Six Cities, SCE, SRMP</p>	
<p><i>Issue 4. Policy Initiatives Roadmap</i></p>	<p>Bonneville would like to see a more influential role for the Governing Body and the Board in the roadmap process. The change that Bonneville is advocating for would give the Governing Body and the Board the authority to prioritize or deprioritize specific issues. The Governing Body and Board would not provide input on every roadmap issue and would only request prioritization of the issues that are of particular importance to either of them.</p>	<p>RSP Section III, Issue 4.IC</p>
	<p>CMUA supports the GRC's Proposal on this topic.</p>	<p>RSP Section III, Issue 4.IC</p>
	<p>Chelan supports retaining the approach that the Governing Body and Board provide input on the roadmap and the final content of the roadmap is left to CAISO management’s discretion. However, Chelan recommends the GRC consider an option that would allow the Governing Body and Board to add priority issues to the roadmap if necessary, to ensure they are addressed in a timely manner. Chelan also recommends CAISO work with stakeholders to develop evaluation criteria that CAISO would use when choosing which initiatives to include in the roadmap and when determining which initiatives necessitate priority resources and timing.</p>	<p>RSP Section III, Issue 4.IC</p>

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<i>Issue 4. Policy Initiatives Roadmap</i>	CPUC Energy Division staff is supportive of the GRC's recommendation that CAISO continue the current roadmap process without making any changes.	RSP Section III, Issue 4.IC
	The Joint EIM Entities commend the GRC for their thoughtful consideration of this issue and do not oppose the recommendation.	RSP Section III, Issue 4.IC
	PGP supports the GRC recommendation to maintain the existing CAISO process for development of the Annual Policy Initiatives Roadmap and recommends that CAISO develop decision criteria, with stakeholder input, that will be used for deciding what initiatives are included in the roadmap.	RSP Section III, Issue 4.IC
	PIOs support the GRC's proposal to not require formal approval of the Annual Policy Initiatives Roadmap, as it would negatively impact the flexibility, efficiency and productivity of the CAISO in advancing policy initiatives.	RSP Section III, Issue 4.IC
	PPC wants to allow the Governing Body and Board to add priority issues to the roadmap if necessary to ensure these issues are addressed in a timely manner. PPC believes this recommendation would balance the needs of enabling the decision-makers to direct work, while allowing CAISO management important flexibility in adjusting planned workload.	RSP Section III, Issue 4.IC
	SCE agrees with the Governance Review Committee's decision to support the current Policy Roadmap process.	RSP Section III, Issue 4.IC
<i>Issue 4: Governing Body Role with DMM, MSC and Outside Market Expert</i>	AWEA generally supports providing the Governing Body with an increased role on the Department of Market Monitoring (DMM) Oversight Committee and with joint authority in approving members of the Market Surveillance Committee (MSC). AWEA believes an outside market expert to provide the Governing Body with advice is also an improvement to the current governance structure.	RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)

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<p><i>Issue 4: Governing Body Role with DMM, MSC and Outside Market Expert</i></p>	<p>Bonneville supports the recommendation of increased interaction between the Governing Body and Department of Market Monitoring (DMM). Given that the Governing Body member’s participation in DMM executive session meetings would not include exercising the authority of the Board as a voting member, and that the Governing Body member is expected to relay what is learned to the rest of the Governing Body, Bonneville supports extending the invitation to all Governing Body members. Bonneville supports the GRC’s proposal for the Governing Body to have joint authority over the approval of Market Surveillance Committee (MSC) members. Bonneville strongly supports the GRC’s proposal for the Governing Body to retain the services of an outside market expert that directly reports to them. Bonneville believes that the GRC’s proposal should not limit the scope of issues the OME could address. Bonneville appreciates the GRC’s proposal that the OME begin work before any final decision on EDAM market design, and is very supportive of retaining the OME’s services as early as possible.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>
	<p>The BOSR supports the GRC’s recommendation that if EDAM goes forward, the Governing Body should be able to contract for and select an outside market expert to provide expertise about the development and implementation of EDAM. Further, the BOSR supports the GRC’s recommendation that the Governing Body’s role in the CAISO Market Surveillance Committee (MSC) and Department of Market Monitoring (DMM) should be expanded to be more equal to that of the Board regardless of whether EDAM goes forward.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>
	<p>CESA opposes the GRC's proposal to ensure the Governing Body access to an additional Outside Market Expert (OME) if the Extended Day-Ahead Market (EDAM) moves forward. CESA recommends maintaining the authority of the MSC in all market design and related matters. The MSC is a credible body with experts able to provide valuable advice on matters related to EIM and EDAM, as well as to regular ISO matters.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>

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<p><i>Issue 4: Governing Body Role with DMM, MSC and Outside Market Expert</i></p>	<p>CMUA generally supports these aspects of the Straw Proposal. CMUA would like to further comment on the establishment of an Outside Market Expert (OME). CMUA understands the proposal to be applicable to EDAM, and supports that approach. Some stakeholders may seek an accelerated timeline for the establishment of the OME, but CMUA would appreciate if the GRC could address this issue specifically in its next Proposal.</p>	<p>RSP Section III, Issue 4.IIC and 4.IID(ii)</p>
	<p>Chelan agrees that the Governing Body will need equal access as the Board to market data, information and analysis produced by the Department of Market Monitoring and Market Surveillance Committee. Chelan also supports the GRC’s recommendation to provide the Governing Body with joint authority to approve MSC members. With respect to DMM oversight, Chelan supports the Governing Body having the maximum level of involvement possible. Chelan supports the GRC’s recommendation to have a Governing Body member regularly attend the DMM Oversight Committee executive sessions.</p>	<p>RSP Section III, Issue 4.IIC and 4.IID(i)</p>
	<p>Chelan strongly supports providing the Governing Body with the authority and budget to retain an outside market expert, and the discretion to select that market expert. Chelan agrees the continued need for that outside market expert should be reevaluated after a reasonable period of market operation (five years seems reasonable). Chelan also believes significant deference should be given at that time to the Governing Body’s assessment, in consultation with market participants and other stakeholders, of whether retention of an outside market expert still provides value.</p>	<p>RSP Section III, Issue 4.IIC and 4.IID(ii)</p>
	<p>CPUC Energy Division staff generally supports discussion of a role for the Governing Body on the DMM Oversight Committee. With respect to whether the Governing Body should have joint authority over approval of MSC members, ED staff has no comments at this time. Lastly, ED staff is concerned that establishing a distinct market expert entity would be inefficient by duplicating existing functions and resources without adding significant value.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>

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<p><i>Issue 4: Governing Body Role with DMM, MSC and Outside Market Expert</i></p>	<p>CPUC Public Advocates Office recommends that if the Governing Body is provided equal access to DMM and MSC market data, CAISO should provide detailed information on the costs incurred to produce this service, information on whether the incurred costs will be paid for, jointly, by the CAISO and EIM entities, information on whether the Governing Body will contribute their data, information and analysis to the CAISO, and costs and benefit evaluations of this proposal. If the CAISO implements EDAM, the Public Advocates Office recommends the Governing Body should demonstrate a need to hire outside experts to provide expertise and information that the DMM and MSC is unable to provide to the Governing Body.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>
	<p>The Joint EIM Entities support having a Governing Body member be invited to attend the executive session meetings of the DMM oversight committee. They support the recommendation that the Governing Body have joint authority to approve members of the MSC. They support the proposal that the Governing Body should have an OME should EDAM move forward and believe the proposed re-evaluation after five years is reasonable. In an EIM-only scenario, GRC recommends leaving it to the Governing Body to propose the use of an expert. The EIM Entities support this approach given information at this time, however in light of events surrounding the August heat wave, the EIM Entities may amend this position to support the use of an independent market monitor for the EIM-only scenario.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>
	<p>PG&E supports the proposed evolution of the DMM and MSC to support the broader multi-state market under EDAM, and the role of the Joint Authority in selection of new MSC members.</p>	<p>RSP Section III, Issue 4.IIC and 4.IID(i)</p>
	<p>PG&E opposes the proposal for an additional Outside Market Expert (OME) to support only the EIM community. PG&E believes a better approach to addressing the analytical support needs of the expanded, multi-state footprint would be to incorporate broader geographic diversity criteria in the selection of new MSC members and, if desired, to expand the membership of the existing MSC. At a minimum, any such expert position should be funded on a voluntary basis by the EIM parties and not charged to all load.</p>	<p>RSP Section III, Issue 4.IIC and 4.IID(ii)</p>

Comment Areas	Stakeholder Comments	RSP Section
<p><i>Issue 4: Governing Body Role with DMM, MSC and Outside Market Expert</i></p>	<p>PGP supports the proposals to permit a Governing Body member to participate in DMM oversight committee meetings and to have joint authority over the approval of MSC members. PGP supports the recommendation to allow the Governing Body to propose the use of an expert in the EIM if they believe that is warranted. PGP believes an OME could add value to the market functioning, regardless of whether EDAM moves forward.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>
	<p>PIOs support the GRC’s recommendation to provide both the Governing Body and the Board with equal access to market data, information, and analysis produced by CAISO’s Department of Market Monitoring and the Market Surveillance Committee. And, if EDAM moves forward, the Governing Body should be provided with additional outside expertise on market issues in the form of an outside market expert.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>
	<p>Public Power supports the proposed Governing Body participation in the DMM Oversight Committee meetings and joint authority over appointments to MSC. Public Power also agrees that the Governing Body should have the ability to commission an outside expert to address the additional complexity inherent in EDAM.</p>	<p>RSP Section III, Issue 4.IIC, 4.IID(i), and 4.IID(ii)</p>
	<p>PPC strongly supports the proposal to make an outside market expert available to the Governing Body. PPC also supports the proposal to put the OME in place prior to final review of the proposed EDAM market design and believes the OME selection process should begin in advance of the conclusion of the EDAM market design process. PPC supports the Governing Body making the selection of the OME and recommend that stakeholders develop through the GRC process criteria for the Governing Body to use in this selection.</p>	<p>RSP Section III, Issue 4.IIC and 4.IID(ii)</p>
	<p>SCE concurs with the proposed participation of a Governing Body member (or more than one member) at meetings of the Department of Market Monitoring Oversight Committee and Market Surveillance Oversight Committee. Also, SCE supports the participation of Governing Body members in the appointment of members to the DMM Oversight Committee and the MSC Oversight Committee.</p>	<p>RSP Section III, Issue 4.IIC and 4.IID(i)</p>

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<i>Issue 4: Governing Body Role with DMM, MSC and Outside Market Expert</i>	SCE remains empathetic to the request for access to and the hiring of an outside market expert (OME) to conduct market analyses and render technical advice and opinions to the Governing Body if the CAISO proceeds with EDAM. SCE objects to the CAISO providing funding for this request if accompanied by the billing of all market participants. The principle of beneficiary pays, or cost causation must be considered. In addition, SCE agrees that the OME, if hired, should not have a role that interfaces with the DMM’s discharge of its responsibilities.	RSP Section III, Issue 4.IIC and 4.IID(ii)
<i>Issue 4: Possible funding for the BOSR</i>	AWEA supports the provisions of funding for the BOSR. AWEA understands the potential equity concerns with having BOSR funding obtained from the CAISO tariff. However, if the BOSR is expanded to include non-voting public power representatives this may help address the equity concerns that have been raised.	RSP Section III, Issue 4.IIIC
	Bonneville agrees with the GRC in seeking further stakeholder input and proposals for possible funding for the BOSR.	RSP Section III, Issue 4.IIIC
	The BOSR recommends that funding to support this important role should be allocated among all state jurisdictional utilities participating in the EIM, including California IOUs. The allocation between these participants should be equitable and rational. The BOSR is evaluating several options including, but not limited to, allocating the funding equally among all participating IOUs, reflecting the consensus-based approach to decision making in the BOSR. Under this option, each IOU’s allocation would be equal to: the total annual BOSR budget ÷ number of EIM IOUs. Collecting the funds through a component of the grid management charge (GMC) charged to specific entities through the CAISO tariff is an option that is administratively efficient, durable, and stable and preserves the BOSR’s independence. The BOSR remains open to proposals from other stakeholders on both the funding allocation and the collection mechanism.	RSP Section III, Issue 4.IIIC
	CMUA agrees that states need tools to enable understanding of market design choices and the impacts of these complex issues on state energy policy. However, CMUA firmly opposes any proposed CAISO-administered charge as a vehicle for funding these efforts.	RSP Section III, Issue 4.IIIC

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<p><i>Issue 4: Governing Body Role with DMM, MSC and Outside Market Expert</i></p>	<p>Chelan does not object to the BOSR securing technical expertise or other resources it determines it needs to effectively participate in CAISO policy initiatives. Chelan agrees with the GRC that the appropriate funding source for any such resource is likely the state commission jurisdictional utilities and securing funding through a generally applicable CAISO market charge would not be equitable.</p>	<p>RSP Section III, Issue 4.IIIC</p>
	<p>CPUC Energy Division staff supports additional resources for the BOSR to effectively participate in stakeholder processes and provide input to the Governing Body. We believe funding would be appropriately collected through the EIM tariff.</p>	<p>RSP Section III, Issue 4.IIIC</p>
	<p>The Joint EIM Entities have concerns with a funding mechanism for the BOSR that is through a CAISO and FERC-administered charge.</p>	<p>RSP Section III, Issue 4.IIIC</p>
	<p>PG&E has signed on with the SRMP proposal for a limited non-tariff funding mechanism that could be established through voluntary contractual arrangements, provided such funding is equitably shared among the participating EDAM states and is structured in a way that is acceptable to the BOSR members.</p>	<p>RSP Section III, Issue 4.IIIC</p>
	<p>PGP is not opposed to the BOSR receiving additional technical support but recommends that any additional funding for the BOSR come only from utilities subject to state regulation.</p>	<p>RSP Section III, Issue 4.IIIC</p>
	<p>PIOs strongly support funding for the BOSR. While PIOs have previously supported the use of a tariff rider to provide this funding, they support the current negotiations between the BOSR and EIM Entities to provide this funding through a separate agreement, ensuring that market participants that are not state jurisdictional will not be required to financially support the stakeholder engagement of state regulators.</p>	<p>RSP Section III, Issue 4.IIIC</p>
	<p>Public Power agrees that technical support from the Western Interstate Energy Board would be beneficial by enhancing BOSR members' engagement in policy initiatives. Funding for BOSR support, either provided by WIEB or in whatever means is ultimately chosen by the BOSR, should be from a charge that only applies those entities who are subject to state commission jurisdiction, and should not be administered by the CAISO.</p>	<p>RSP Section III, Issue 4.IIIC</p>

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<p><i>Issue 4: Governing Body Role with DMM, MSC and Outside Market Expert</i></p>	<p>The Six Cities do not oppose the concept of funding for the activities of the BOSR to facilitate informed review of Real-Time market rules by that group. However, Six Cities believe such funding should be provided exclusively by entities regulated by voting members of the BOSR and should be proportional to voting rights rather than based on load or level of market participation. The Six Cities would oppose any funding mechanism for the BOSR that would involve charges collected by the CAISO based on load or market participation.</p>	<p>RSP Section III, Issue 4.IIIC</p>
	<p>SCE supports funding of the BOSR and continues to participate in discussions on finding an appropriate mechanism for the BOSR’s funding.</p>	<p>RSP Section III, Issue 4.IIIC</p>
	<p>The SRMPs have a concern with the institution of a funding mechanism via the FERC-administered CAISO tariff to secure that support. The SRMPs recommend that the GRC continue to support BOSR funding but should not go so far as to recommend a CAISO-tariff funding mechanism.</p>	<p>RSP Section III, Issue 4.IIIC</p>
<p>Issue 5: Guiding Principles</p>	<p>BPA, Chelan, Joint EIM Entities, PGP, PIO, PPC, SCE</p>	
<p><i>Issue 5: Guiding Principles</i></p>	<p>Bonneville is supportive of stakeholder input on a mechanism for EDAM mission and criteria development.</p>	<p>RSP Section III, Issue 5C</p>
	<p>Chelan supports the GRC re-evaluating the mission statement, and accompanying decision criteria, once proposed EDAM market design has reached a sufficient level of maturity. Chelan also recommends considering whether a mission statement and decision criteria should be developed that are applicable to both the Governing Body and Board and that would guide the exercise of their joint authority decision-making.</p>	<p>RSP Section III, Issue 5C</p>
	<p>The Joint EIM Entities agree that no changes are necessary to the mission statement and criteria for decision making and that these can easily be adapted to accommodate EDAM at a later date.</p>	<p>RSP Section III, Issue 5C</p>
	<p>PGP recommends that the Governing Body Mission Statement be re-evaluated for EDAM and this review should be conducted by the GRC after the CAISO staff has developed a draft final proposal on EDAM market design. PGP believes it is essential to retain the exit criteria in the Governing Body Mission for any EDAM Mission Statement.</p>	<p>RSP Section III, Issue 5C</p>

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<i>Issue 5: Guiding Principles</i>	PIOs support amending the Governing Body’s Mission Statement to reflect the Governing Body’s expanded role with regard to EDAM, but not until the market design for EDAM has been finalized and approved by stakeholders, both boards, and FERC.	RSP Section III, Issue 5C
	PPC supports the existing mission statement for the Governing Body regarding its role governing the EIM and requests an additional discussion with the GRC and other stakeholders to review the Governing Body mission statement at the conclusion of the EDAM market design process and prior to finalizing the EDAM governance structure.	RSP Section III, Issue 5C
	SCE agrees that the current Governing Body mission statement within the Charter for EIM Governance is adequate and concurs with the GRC’s decision to reserve recommendation for change until the market design for EDAM becomes advanced. If the GRC wishes to consider inclusion of a clause within the Charter that its provisions shall be amended when the market design for EDAM is approved and commences implementation, SCE can offer its support.	RSP Section III, Issue 5C
Issue 6: Other topics for consideration	AWEA, BPA, BOSR, Chelan, CPUC ED, Joint EIM Entities, PGP, PIO, PPC, PPU, SCE, WAPA	
<i>Issue 6: Other topics for consideration</i>	Bonneville is supportive of the re-evaluation of the governance as proposed by the GRC and agrees with the five year time span.	RSP Section III, Issue 6C
	The BOSR supports the application and inclusion of these principles in the GRC’s process.	RSP Section III, Issue 6C
	Chelan supports building in a stakeholder-led review of the governance structure no later than five years after any new governance structures have been implemented as a result of the GRC process. Chelan also supports the GRC remaining available to further consider any EDAM-specific aspects once the CAISO staff has developed a draft final proposal that addresses the main elements of the proposed EDAM market design.	RSP Section III, Issue 6C

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Comment Areas	Stakeholder Comments	RSP Section or GRC Response
<p><i>Issue 6: Other topics for consideration</i></p>	<p>CPUC Energy Division Staff believes the currently-established schedule of submitting a draft final proposal to the Board and Governing Body by Q1 2021 may be overly expedited given their outstanding concerns on Issue 1.</p>	<p>The GRC believes that its established schedule is achievable, but is open to adjusting the schedule if more time proves to be needed to address outstanding concerns.</p>
	<p>The Joint EIM Entities support the proposal for a re-evaluation no later than five years after the adoption of new governance policies. The Joint EIM Entities strongly support proceeding with the recommendations for the EIM first and then expanding to include EDAM. In addition, the GRC should clarify that the new joint authority would apply to approving and providing direction on the EDAM market design. The Joint EIM Entities support the GRC's suggestion to remain available for further evaluation prior to adoption of the EDAM market design.</p>	<p>RSP Section III, Issue 6C, RSP Section III, Issue 1D</p>
	<p>PGP supports the GRC proposal for a stakeholder-led review of the governance structure no later than five years after any new governance structure has been implemented. PGP also supports the recommendation that the GRC remain available after submission of the governance proposal to further consider any EDAM-specific aspects of governance once the CAISO staff has developed a draft final proposal for EDAM market design.</p>	<p>RSP Section III, Issue 6C</p>
	<p>PIOs support the recommendation to conduct a stakeholder-led review of the governance structure no later than five years after any new governance structure has been implemented regardless of the timing associated with EDAM implementation.</p>	<p>RSP Section III, Issue 6C</p>

Stakeholder Comments to the July 31, 2020 Straw Proposal and corresponding section in December 14, 2020 Revised Straw Proposal

Comment Areas	Stakeholder Comments	RSP Section
<i>Issue 6: Other topics for consideration</i>	PIOs support the GRC’s recommendation to submit its draft final governance proposal to both boards by Q1 2021. Additionally, PIOs recommend that the GRC remain available after submission of the draft final proposal to further consider any EDAM-specific changes that will be necessary once EDAM’s final market design is better understood.	RSP Section III, Issue 6C
	PPC would like to understand the CAISO’s perspective on how the proposed governance structure interacts with the ISO’s statute-driven obligations to the State’s consumers set out in Pub. Util. Code Sec. 345.5 and, specifically, how those obligations could impact the durability of the governance structure.	RSP Section III, Issue 6C, Appendix A
	PPC would like to understand the CAISO’s perspective on how its statutory obligations in Pub. Util. Code Sec. 345.5 to reduce and minimize economic impacts to California consumers square with the CAISO’s obligations under the Federal Power Act to offer just and reasonable rates, rules, and regulations and non-discriminatory treatment to all market participants.	RSP Section III, Issue 6C and Appendix A
	PPC supports the GRC proposal to implement EIM governance changes on the timeline proposed and EDAM governance changes once the EDAM market proposal is finalized.	RSP Section III, Issue 6C
	Public Power agrees with the GRC’s recommendation to maintain the schedule to submit a draft final proposal to the Board by the first quarter of 2021, rather than waiting for a determination of additional details of the EDAM market design.	RSP Section III, Issue 6C
	SCE offers its support for the GRC to remain available for later development of governance proposals to facilitate EDAM and to develop amendments to the Governing Body mission statement, should stakeholders and the GRC decide to present the EIM-only governance changes due to the lengthy development process for EDAM.	RSP Section III, Issue 6C

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Comment Areas	Stakeholder Comments	RSP Section or GRC Response
<p><i>Issue 6: Other topics for consideration</i></p>	<p>SCE would like to understand how the Governance Review Committee plans to resolve the following excerpt from the legal analysis provided: "...by irrevocably preventing the Board from changing any delegation or sharing of authority, [it] could jeopardize the CAISO's ability to maintain its exempt status" since the joint authority model does not conform with the CAISO's business operations.</p>	<p>As discussed in Appendix A, the Joint Authority model proposed by the GRC does not jeopardize the CAISO's ability to maintain its tax status because it includes provisions that both require Board's concurrence for any proposed tariff amendment to be filed at FERC and includes provisions that allow the Board alone to withdraw the delegation of authority to the Governing Body.</p>