



EIM Governance Review Committee Straw Proposal

**Public Generating Pool Comments
April 29, 2019**

The Public Generating Pool (PGP)¹ appreciates the opportunity to comment on the California ISO's Energy Imbalance Market (EIM) Governance Review Straw Proposal for Formation of an EIM Governance Review Committee dated April 1, 2019. We continue to be supportive of a new interim stakeholder committee whose role is focused on facilitating the EIM governance review and offer the following comments regarding the role, scope of work and process of the Governance Review Committee (GRC).

I. ROLE AND SCOPE OF WORK

PGP supports the role of the GRC to develop proposed revisions to the current EIM governance structure. We appreciate the emphasis on the incorporation of the GRC work into an iterative public stakeholder process and believe it is imperative that the broader stakeholder constituents are provided ample opportunity to comment on the work products produced by the GRC.

For the scope of work, we believe the GRC should begin with the scope of potential EIM governance changes provided in stakeholder comments in response to CAISO's EIM Governance Review Issue Paper & Straw Proposal dated December 14, 2018. Stakeholders invested considerable time and effort in developing thoughtful comments on the items they believe should be within the scope of the EIM Governance Review and their comments should be given due consideration by the GRC.

We also support the inclusion of a proposal for EDAM Governance to be within the scope of the GRC. We note that EDAM has a much broader impact on entities outside of California than does the EIM and as such, merits consideration of a more comprehensive and expansive set of governance changes.

¹ PGP represents ten consumer-owned utilities in Oregon and Washington that own almost 6,000 MW of generation, 4,500 MW of which is hydro and 95% of which is carbon-free. Three of the PGP members operate their own Balancing Authority Area (BAA), while the remaining members have service territories within the Bonneville Power Administration's (BPA) BAA.

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II. PROCESS FOR ESTABLISHING COMMITTEE MEMBERSHIP

Diverse GRC Participation

PGP appreciates the emphasis on establishing a diverse and sophisticated committee that is geographically diverse and collectively reflect a broad range of stakeholder and industry sectors that are involved, in process of being involved, or are impacted by the EIM.

PGP thanks CAISO for including consideration of balancing authorities that have entered a formal public process to consider joining the EIM, along with publicly-owned utilities located within such balancing authorities. As BPA continues its process for evaluating its participation in the EIM, it is important that both BPA and the publicly-owned utilities located within the BPA balancing authority distinctly play a role in the GRC process.

Further, as the EIM seeks to continue to expand, we believe it is also important to include potential new EIM entrants and those balancing authorities impacted by the EIM (balancing authorities adjacent to EIM Entities) in the GRC process. We request CAISO consider expanding the stakeholder sectors to include these balancing authorities, noting that they are included in the stakeholder sectors defined for the Regional Issues Forum.

Lastly, PGP understands the importance of having substantive engagement from the EIM Governing Body and ISO Board of Governors in the EIM Governance Review process and agrees that both bodies should be kept well-informed of ongoing developments. We believe it is more appropriate that the member from each the EIM Governing Body and the Board serve in an advisory capacity to the GRC rather than be included as a voting member of the GRC.

GRC Member Nomination and Selection Process

PGP requests that any individual nominated by an entity within a defined stakeholder sector that has confirmed a willingness to serve on the GRC and meets the qualifications in Section III. A. of the draft EIM GRC Charter be included on the list of nominees for their respective sector.

Similarly, we do not believe that sectors should be required to nominate at least three candidates. As CAISO and others have noted, the GRC will require a significant time commitment from members. It is possible that not all sectors may have three qualified candidates that are able and willing to serve on the GRC.

Lastly, we request transparency in the process and criteria for selecting GRC members and request the sector nominees and rankings be made publicly available at the time they are provided to the EIM Governing Body and ISO Board of Governors.

III. CONCLUSION

PGP appreciates CAISO's continued efforts in advancing the EIM Governance Review process through development of a GRC and hopes to see the GRC appointed in a timely manner.

Public Generating Pool

Benton PUD / Chelan County PUD / Clark Public Utilities / Cowlitz County PUD / Eugene Water & Electric Board
Grant County PUD / Klickitat County PUD / Lewis County PUD / Snohomish County PUD / Tacoma Power