

Comments of Seattle City Light

EIM Governance Review

Revision of Decisional Classification Rules

Draft Final Proposal

Submitted by	Company	Date Submitted
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Seattle City Light (Seattle) is the tenth largest consumer owned electric utility in the nation, providing electrical service to more than 450,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. Seattle owns and operates hydroelectric resources with approximately 2,000 MW of flexible, fast-ramping capacity. We regularly transact in the wholesale energy and transmission markets. Seattle executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Western Energy Imbalance Market (EIM) in April 2020.

Seattle appreciates CAISO’s quick action in moving the changes to EIM decisional classification forward. Seattle recognizes that this a first step in changes to EIM governance, and that further governance changes will be considered in a separate phase of EIM governance review.

Seattle continues to support the expansion of the governing body’s primary authority over initiatives as proposed in the draft final proposal. Seattle believes it would be helpful to clarify how the decisional classification changes would impact the classification of existing policy initiatives. Seattle respectfully requests that CAISO reclassify a sample of initiatives in the CAISO policy catalog to provide a practical demonstration of which initiatives would change from being classified as under the EIM Governing Body’s advisory authority to primary authority. Seattle understands that the classification of initiatives in the catalog are preliminary until the initiative commences, notwithstanding, we still believe it would be helpful to all stakeholders to provide an illustrative example of how decisional classifications may change under the draft proposal, recognizing that these are subject to change.

Seattle reiterates its support, as described in our January 18 comments, for further incremental changes that would expand the EIM governing body’s primary authority over all real-time market rules and also over the EDAM initiative if and when this initiative commences.

Seattle looks forward to seeing the proposed changes to EIM decisional classification clarified and effectuated and we look forward to participating in future phases of governance review that will follow. As a first step in a broader governance review, we continue to support establishing an EIM Governance Review Committee and look forward to participating in and supporting this work going forward.

Thank you for the opportunity to comment and if you have any questions please contact Lea Fisher at lea.fisher@seattle.gov (206) 386-4546.