



Oregon

John A. Kitzhaber, MD, Governor

Public Utility Commission

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November 5, 2013

Board of Governors
California Independent System Operator Corporation
PO Box 639014
Folsom, CA 95763-9014

Dear Board of Governors,

The Oregon Public Utility Commission recommends that you approve the energy imbalance market (EIM) design and provide the authority for ISO management to make the necessary filings at FERC to implement tariff changes.

We regulate PacifiCorp's operations in Oregon. PacifiCorp serves nearly 560,000 Oregon households and businesses. We believe that a voluntary Western EIM will benefit those customers through lower system cost and enhanced reliability as we integrate more wind and solar generation into the grid.

We have been briefed by ISO staff and tracked the open stakeholder process to craft a market design and resolve design issues. We are impressed with the efforts made to address and resolve stakeholders' issues. We believe that the ISO staff has proposed a workable design that can evolve over time.

In addition, we support the ISO's efforts to create an independent EIM governance structure. We will review and comment on any revised governance proposal.

We applaud the ISO and PacifiCorp for demonstrating leadership on this issue and we thank the ISO board for the opportunity to offer comments.

Sincerely,


Susan Ackerman
Chair


John Savage
Commissioner


Steve Bloom
Commissioner