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3Degrees
American Wind Energy Assoc.
Atkins
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Bonneville Environmental
Foundation
BP Wind Energy
Calpine
Center for Energy Efficiency &
Renewable Technologies
Christensen Electric
Citizens' Utility Board
Climate Solutions
Columbia Gorge
Community College
Community Renewable
Energy Association
E.ON Climate & Renewables
EDF Renewable Energy
EDP Renewables
Element Power
Environment Oregon
Environment Washington
Eurus Energy America
FirstWind
Gaelectric
Gamesa Energy USA
GE Energy
Geothermal
Resources Council
GL Garrad Hassan
Green Mountain Energy
HDR Engineering, Inc.
Iberdrola Renewables
Jones Stevedoring
K&L Gates, LLP
Kapla Law, PLLC
Lane Powell, PC
MAP
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Information Center
MontPIRG
Natural Capital Partners
Natural Resources
Defense Council
NextEra Energy Resources
Northwest Environmental
Business Council
Northwest SEED
NW Energy Coalition
OneEnergy Renewables
Oregon Tech
Oregon Solar Energy
Industries Association
OSPIRG
Portland Energy
Conservation, Inc.
REC Silicon
REpower USA
RES America Developments
SolarCity
Solar Oregon
Stoel Rives, LLP
SunPower Corporation
SWCA Environmental Consultants
Tonkon Torp, LLP
Vestas Americas
Warm Springs Power &
Water Enterprises
Washington
Environmental Council
WashPIRG
Western Resource Advocates



**Renewable
Northwest
Project**

October 31, 2013

**Board of Governors
California Independent System Operator
250 Outcropping Way
Folsom, CA 95630**

Dear Board of Governors:

I am writing in support of the PacifiCorp and California Independent System Operator (ISO) real-time energy imbalance market (EIM). Renewable Northwest Project (RNP) is a non-profit coalition of renewable energy businesses, environmental organizations, and consumer advocates. A well-designed EIM will improve the reliability of the regional transmission system; it will allow more renewables to cost-effectively integrate into the existing grid; and it will decrease ratepayers' bills by optimizing the efficiency of within-hour dispatch. The current CAISO/PacifiCorp EIM market design appears to be structured to capture these benefits. As such, RNP supports the approval of the EIM market design.

Moving forward, RNP is also interested in ensuring that the CAISO/PacifiCorp EIM effort proves attractive to a broad group of potential participants. We support an independent governance structure with diverse representation from around the West.

RNP would also like to emphasize the importance of maintaining the efficiencies from implementing 15-minute schedules over the CAISO's interties. Although an EIM will efficiently dispatch generators on a five-minute basis, renewable generators will need to decrease their exposure to imbalance energy and capacity charges by scheduling on a 15-minute basis into the CAISO. An EIM should not interfere with or diminish the functionality of 15-minute scheduling between the CAISO and its neighbors.

With these comments, RNP strongly encourages the ISO Board of Governors to approve the EIM market design. This is a very exciting step for the Western Interconnection.

Sincerely,

**Cameron Yourkowski
Senior Policy Manager**