

Stakeholder Comments Template

Submitted by	Company	Date Submitted
James Shetler jimshetler@thebanc.org	Balancing Authority of Northern California	July 11, 2015

The Balancing Authority of Northern California (BANC)¹ appreciates the opportunity to provide comments to the EIM Transitional Committee regarding its draft final proposal for EIM Governance (Draft Final Proposal). BANC is limiting its comments to the proposed creation of the Regional Advisory Committee (RAC) described in the Draft Final Proposal.

1. Basics of the EIM governing body
Comment: No Comments at this time.
2. Selecting members of the EIM governing body (including the selection process and composition of the nominating committee)
Comment: No Comments at this time.
3. Scope of authority (including the proposed process for resolving disputes about which body has primary authority over a particular policy initiative)
Comment: No Comments at this time.

¹ BANC is a Joint Powers Agency consisting of the Sacramento Municipal Utility District, Modesto Irrigation District, City of Roseville, City of Redding, City of Shasta Lake, and Trinity Public Utilities District. BANC is a registered Balancing Authority (BA) and provides BA services to its member public agencies.

<p>4. Composition and role of the advisory body of state regulators (including leaving development of their role and relationship with the ISO to the regulators themselves)</p>
<p>Comment:</p> <p>No Comments at this time.</p>
<p>5. Regional Advisory Committee (including what issues the proposed committee should address and whether it would provide a productive forum for discussion of the issues and/or would enhance the ISO’s existing stakeholder process)</p>
<p>Comment:</p> <p>BANC strongly supports the formation of the RAC as generally described in the Draft Final Proposal. While the addition of the RAC to the EIM Governance construct lacks some details, the concept of creating a committee of participants in the West that have not yet joined EIM, including neighboring adjacent balancing authority areas, is a good idea and, as the CAISO notes, “could help resolve inevitable seams issues as the EIM continues to develop.” Draft Final Proposal at 12.</p> <p>Specifically, BANC believes the RAC could prove useful in providing another independent source of input to the EIM governing body regarding inter-balancing authority area and market-related issues and observations. This will be more important as additional systems are added the CAISO EIM footprint.</p>
<p>6. Commitment to re-evaluate governance</p>
<p>Comment:</p> <p>No Comments at this time.</p>
<p>7. Miscellaneous items.</p>
<p>Comment:</p> <p>No Comments at this time.</p>