Stakeholder Comments Template

Submitted by	Company	Date Submitted
Anita J. Decker Executive Director Northwest Public Power Association 9817 NE 54 th Street, #200 Vancouver, WA 98662-6064	Northwest Public Power Association	July 10, 2015 [submitted via email]

Please use this template to provide written comments on the draft final proposal for the EIM Governance posted on June 22, 2015.

Please submit comments to EIM@caiso.com by close of business July 9, 2015

The draft final proposal is available on the ISO website at: <u>http://www.caiso.com/Documents/Briefing_Governance_Proposal-DraftFinalProposal-June2015.pdf</u>

The slides presented during the June 25, 2015 EIM Transitional Committee meeting are available at:

http://www.caiso.com/Documents/Briefing_GovernanceProposal-Presentation-Jun2015.pdf

The EIM Transitional Committee welcomes and appreciates stakeholder feedback related to the draft final proposal for the EIM Governance Development initiative.

Please use the following template to comment on the key topics addressed in the proposal. Organizing your submission around the different sections of the EIM governance proposal will assist the Committee in its review of the comments.

1. Basics of the EIM governing body

Comment:

2. Selecting members of the EIM governing body (including the selection process and composition of the nominating committee)

Comment:

3. Scope of authority (including the proposed process for resolving disputes about which body has primary authority over a particular policy initiative)

Comment:

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)

Comment:

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)

Comment:

NWPPA supports the recommendations of the Regional Advisory Committee as presented, realizing the necessity for fine tuning responsibilities and process through implementation. The stated premise of the function and purpose of the Regional Advisory Committee, appear to provide the only opportunity for public power entities to engage with the governance of the EIM. While recognizing the limitations of an advisory committee as compared to that of the EIM Governing Body or the Advisory Body of State Regulators, public power's input to the EIM governance through the Regional Advisory Committee is essential to the protection of consumers in the region, without which NWPPA would have difficulty supporting the proposal.

6. Commitment to re-evaluate governance

Comment:

7. Miscellaneous items.

Comment:

Many of NWPPA's members remain concerned that the CAISO EIM in conjunction with other affiliate participants will adversely affect NWPPA's public power utilities and their consumers. NWPPA appreciates that the Committee recognized the value and place for public power to be represented as a problem solver and advocate for consumers.