

October 15, 2024

The Honorable Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20246

**Re: California Independent System Operator Corporation
Docket No. ER25-____-000**

**Tariff Amendment to Enable Inter-SC Trades of Energy in
WEIM and EDAM Balancing Areas, and Request for Waiver of
Notice Requirement**

Dear Secretary Reese:

The California Independent System Operator Corporation (CAISO) submits this tariff amendment to enable inter-scheduling coordinator (inter-SC) trades of energy in balancing areas participating in the Western Energy Imbalance Market (WEIM) and the Extended Day-Ahead Market (EDAM).¹ Inter-SC trades are an optional settlement feature in the CAISO balancing area that facilitates settlement between two scheduling coordinators and supports streamlined bilateral financial arrangements between the parties. Currently inter-SC trades are not supported in WEIM or EDAM balancing areas.

This amendment will extend the Commission-accepted rules supporting inter-SC trades of energy that apply in the CAISO balancing area to balancing areas in the WEIM and EDAM. Extending inter-SC trades of energy to WEIM and EDAM balancing areas will facilitate settlement of bilateral WEIM and EDAM market participant transactions in the real-time and day-ahead markets through the CAISO, which will benefit customers by providing additional value and tools to participants within the broader market footprint. These tariff changes also fulfill a commitment by the CAISO to review with stakeholders the viability of extending

¹ The CAISO submits this filing pursuant to Section 205 of the Federal Power Act (FPA), 16 U.S.C. § 824d, and Part 35 of the Commission's regulations, 18 C.F.R. Part 35. Capitalized terms not otherwise defined herein have the meanings set forth in appendix A to the CAISO tariff, and references herein to specific tariff sections are references to sections of the CAISO tariff unless otherwise specified.

inter-SC trades to WEIM and EDAM balancing areas.² All stakeholders participating in development of the proposal underpinning these tariff changes supported this amendment.

The CAISO requests that the Commission accept the inter-SC trade tariff revisions effective as of the date they are implemented. The CAISO expects that effective date will be May 1, 2026, the CAISO's intended go-live date for EDAM.³ The CAISO also requests that the Commission issue its order accepting the tariff revisions 61 days after this filing, and in any event within 120 days of this filing. Commission acceptance within that timeframe will provide the CAISO and WEIM-EDAM participants with certainty as the CAISO and participants collectively prepare for and implement EDAM. Further, enabling this feature at the same time as EDAM implementation will support an efficient and consistent development and testing process.

I. Background

The CAISO facilitates inter-SC trades of energy, ancillary services, and day-ahead load uplift obligations as part of the settlement processes to support streamlined bilateral contractual financial arrangements that may exist between parties.⁴ Inter-SC trades are an optional feature arranged through the CAISO market between two or more scheduling coordinators. They do not have an impact on market optimization, market scheduling, neutrality or dispatch of resources, because inter-SC trades are purely an optional settlement mechanism between scheduling coordinators. Without the availability of inter-SC trading functionality, all trades between scheduling coordinators are settled bilaterally outside the CAISO's markets. Currently, inter-SC trades are supported only within the CAISO balancing authority area across the day-ahead and real-time markets.

² *Cal. Indep. Sys. Operator Corp.*, 185 FERC ¶ 61,210, at PP 489-93 (2023) (December 20 Order).

³ To allow this effective date, the CAISO respectfully requests waiver of the Commission's notice requirement consistent with the waiver the Commission granted for other EDAM tariff provisions in the December 20 Order. The effective date established by the December 20 Order for the tariff revisions that do not pertain to EDAM implementation is the actual effective date, subject to the CAISO's informing the Commission of that actual effective date within five business days. See December 20 Order at ordering paragraphs (B)-(C); *see also Cal. Indep. Sys. Operator Corp.*, 186 FERC ¶ 61,170, at ordering paragraphs (A)-(B) (2024) (accepting in part, and rejecting in part without prejudice, EDAM tariff changes specific to participation by the CAISO balancing area effective as of the actual effective date). The CAISO will ensure alignment of all EDAM-related effective dates under the Commission's directives to provide notice of the actual effective date within five business days after implementation through an eTariff submittal using Type of Filing code 150 – Report.

⁴ CAISO Tariff, Section 28 *et seq.*

The tariff changes proposed in this filing will extend inter-SC trades of energy to WEIM and EDAM balancing areas. Within the CAISO balancing area, the CAISO operates both a day-ahead ahead and a real-time market through which all load is offered into and settled, and through which all resources are either economically bid or self-scheduled and settled through the market. Additionally, ancillary services and energy are co-optimized within the market and the associated inter-SC trades are settled through the market. Thus the three types of inter-SC trades—energy, ancillary services, and day-ahead load uplift obligations—are each available as an optional feature for scheduling coordinators within the CAISO balancing area to effectuate and facilitate settlement through the market to support potential bilateral contractual arrangements that parties may have in place for transactions involving resources and loads.

At this time, the CAISO is proposing to extend inter-SC trades of energy to WEIM or EDAM balancing areas, not inter-SC trades of ancillary services or day-ahead load uplift obligations. These markets do not currently co-optimize ancillary services with energy, so inter-SC trades of ancillary services are not useful outside of the CAISO balancing area.⁵ Furthermore, although inter-SC trades of the day-ahead load uplift obligation may be useful for EDAM participants, the extension of such service requires more extensive system changes that could interfere with the current timeline for implementation of EDAM.⁶ For these reasons, the tariff changes presented here support extension of inter-SC trades of energy only.

There are two types of inter-SC trades of energy: (1) physical inter-SC trades at a specific physical generating unit pricing node (PNode), and (2) inter-SC trades at aggregate pricing nodes (APNs).⁷ Physical trades allow a scheduling coordinator for a specific resource to submit a physical inter-SC trade at the resource's location, including identification of the counterparty scheduling coordinator. The scheduling coordinator that submitted the physical inter-SC trade for the specific resource can also bid that resource into the day-ahead or real-time markets. There is no limit on the number of physical inter-SC trades that a scheduling coordinator can submit or participate in. Inter-SC trades at APNs are not backed by a physical resource, and can occur at trading hubs or load aggregation points.⁸ A scheduling coordinator can

⁵ The CAISO will consider the extension of inter-SC trades of ancillary services when evaluating co-optimization of ancillary service with energy within the WEIM and EDAM.

⁶ The CAISO remains open to considering the extension of inter-SC trades of day-ahead load uplift obligations as a further enhancement after EDAM implementation.

⁷ CAISO Tariff, Section 28.1.2.

⁸ The tariff defines a trading hub as an aggregation of network pricing nodes maintained and calculated by the CAISO for settlement and trading purposes. The tariff defines a load aggregation

submit an inter-SC trade at an APN identifying a counterparty scheduling coordinator that submits and validates the inter-SC trade at the same location. Scheduling coordinators can participate in one APN inter-SC trade per scheduling coordinator counterparty at each APN location per trading hour.

Inter-SC trades of energy can facilitate contractual delivery and settlement of bilateral power purchases or other trades of energy at defined points on the system.⁹ The inter-SC trade of energy feature, which can be executed in the day-ahead and real-time markets, allows for a quantity of MWs to be traded between two SCs at a specific location for a specific trading hour. Inter-SC trades of energy submitted in the day-ahead market are settled at the hourly day-ahead market locational marginal price (LMP) at the APN or the PNode, depending on the trade location. Inter-SC trades of energy submitted in the real-time market are settled hourly based on the simple average of the real-time market dispatch LMPs at the applicable APN or PNode, depending on the trade location.¹⁰

II. Proposed Tariff Revisions

In this filing, the CAISO proposes tariff changes to extend inter-SC trades of energy to market participants in EDAM and WEIM balancing areas.¹¹ These market participants may have a use for inter-SC trades of energy to support their bilateral contractual arrangements. The benefits of inter-SC trades of energy in EDAM exist because all resources in an EDAM balancing area will offer their supply into the market through economic bids or self-schedules and will be subject to commitment in day-ahead and dispatch in the real-time market. As such, scheduling coordinators may find value in settling bilateral energy trades between scheduling coordinators to facilitate settlement through the market with the appropriate party. EDAM balancing areas will also bid and settle their load in the day-ahead market. EDAM balancing areas may be bidding in the load through a scheduling coordinator for their entire balancing area, or may otherwise have scheduling coordinators bid in discrete load of a load serving entity within the balancing area. As such, there may be value in a scheduling coordinator for a resource to effectuate an inter-SC trade for energy with a scheduling coordinator for the load to settle certain aspects of a bilateral contract through the market.

point as a set of pricing nodes that are used for submission of bids and settlement of demand. See CAISO Tariff, Appendix A definition of Trading Hub.

⁹ The tariff defines energy as the electrical energy produced, flowing or supplied by generation, transmission or distribution facilities, being the integral with respect to time of the instantaneous power, measured in units of watt-hours or standard multiples thereof. See CAISO Tariff, Appendix A definition of Energy.

¹⁰ CAISO Tariff, Sections 11.9 and 28.1.2.

¹¹ See CAISO Tariff, revised Sections 29.28 and 33.28 (applying the provisions of CAISO tariff section 28 to WEIM and EDAM inter-SC trades of energy).

The CAISO also proposes to extend inter-SC trades of energy to balancing areas participating only in the WEIM. In WEIM balancing areas there arguably may be a lesser benefit of the inter-SC trade feature because, in addition to participating resources that actively bid in the market, there are non-participating resources that are not subject to market dispatch because they have indicated their expected level of output through submission of a base schedule. In addition, WEIM entity load is generally not subject to market settlement. As such, the traditional type of inter-SC trades for energy between a scheduling coordinator representing generation and a scheduling coordinator representing load may not have the same level of value or utilization as in EDAM. Nevertheless, the value of inter-SC trades of energy ultimately depends on the nature and structure of the bilateral contracts that parties may execute particularly associated with WEIM participating resources, and enabling the inter-SC trade functionality in WEIM balancing areas provides participants the ability to consider this optional feature and whether it may facilitate their business needs.

Enhancing the WEIM and EDAM through the extension of inter-SC trade functionality for trades of energy will provide market participants outside of the CAISO balancing area access to an existing feature of the CAISO markets. The Commission should accept the tariff changes in this filing as just and reasonable enhancements to the CAISO tariff.¹²

Extension of inter-SC trades of energy to WEIM and EDAM balancing areas was unanimously supported by stakeholders that participated in the process leading up to this filing. In written comments, all stakeholders including the Department of Market Monitoring, supported this proposed direction.¹³ Stakeholders noted that:

¹² See, e.g., *Cal. Indep. Sys. Operator Corp.*, 175 FERC ¶ 61,096, at P 27 (2021) (“[W]e believe the revision to the EIM [Energy Imbalance Market] base schedule timeline is just and reasonable because it allows EIM participants to submit more timely and accurate base schedules closer to the operating hour, which is an improvement over the current Tariff rules.”); *Cal. Indep. Sys. Operator Corp.*, 175 FERC ¶ 61,160, at P 17 (2021) (“In particular, we find that CAISO’s proposed Tariff revisions are just and reasonable measures that should improve CAISO’s ability to manage potentially tight system conditions and constitute improvements for each of the specified areas that can be reasonably implemented in time for summer 2021.”); *Cal. Indep. Sys. Operator Corp.*, 172 FERC ¶ 61,298, at P 18 (2020) (“We find that the proposed tariff revisions are just and reasonable measures to enhance demand response participation in the CAISO markets.”).

¹³ Stakeholder comments are posted and available on the CAISO website at: <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Inter-SC-Trades-in-Regional-Markets>. The same website page contains other materials related to the stakeholder process. The CAISO Board of Governors (Board) and Western Energy Markets Governing Body (Governing Body) authorized the CAISO to submit this tariff amendment at their meeting held on September 26, 2024. Prior to the meeting, Anna McKenna, Vice President Market Design and Analysis for the CAISO, provided the Board and Governing Body with a memorandum describing the tariff revisions. See <https://www.caiso.com/documents/decision-on-inter-scheduling-coordinator-trades-for-regional-markets-memo-sep-2024.pdf>. The memorandum, along with the resolution of the Board and Governing Body authorizing this tariff amendment filing, are provided in attachment C to this filing.

enabling inter-SC trades for energy within WEIM and EDAM balancing areas will provide value as it will help facilitate settlement of certain aspects of bilateral contracts; the functionality can support different business needs and market participation structures; and inter-SC trades can help further integrate bilateral markets in the West.

For all of the reasons explained above, the CAISO respectfully requests that the Commission accept the proposed tariff changes contained in this filing.

III. Effective Date and Request for Waiver of Notice Requirement

The CAISO requests that the Commission accept the inter-SC trades of energy tariff changes effective as of the date they are implemented. The CAISO expects that effective date will be May 1, 2026, the CAISO's intended go-live date for EDAM. To permit the requested effective date, the CAISO also respectfully requests waiver of the Commission's 120-day notice requirement.¹⁴ Good cause exists to grant the requested waiver. The CAISO needs to integrate this functionality into the EDAM project, and WEIM-EDAM participants will need to ensure their customers understand the feature and that they have the opportunity to consider whether any supporting changes or updates may be appropriate. For these reasons, the CAISO requests that the Commission issue an order accepting the proposed tariff revisions 61 days after this filing, and no later than 120 days after this filing, and grant the requested waiver.¹⁵

Consistent with the December 20 Order, and recognizing the actual implementation date of some rule changes can depend on variables that cannot be fully predicted in advance and additional time may be needed to implement some market rule changes, the CAISO further requests authorization to inform the Commission of the actual effective date of the proposed tariff changes through a subsequent filing within five business days following their implementation.¹⁶

¹⁴ Specifically, pursuant to section 35.11 of the Commission's regulations, 18 C.F.R. § 35.11, the CAISO respectfully requests waiver of the notice requirement in section 35.3(a)(1) of the Commission's regulations, 18 C.F.R. § 35.3(a)(1), to allow the tariff revisions described above to go into effect more than 120 days after submittal of this filing.

¹⁵ The only distinction between the request here and the request granted by the December 20 Order is the timeframe within which the order has been requested.

¹⁶ The CAISO has included an effective date of 12/31/9998 as part of the tariff records submitted in this filing. The CAISO will notify the Commission of the actual effective date of these tariff records within five business days of implementation in an eTariff submittal using Type of Filing code 150 – Report. This will also allow the CAISO to ensure a consistent effective date across EDAM tariff revisions requested in different dockets.

IV. Communications

Under Rule 203(b)(3),¹⁷ the CAISO respectfully requests that all correspondence and other communications about this filing be served upon:

John C. Anders
Deputy General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 608-7144
Fax: (916) 608-7296
janders@caiso.com

Sean Atkins
Bradley R. Miliauskas
Davis Wright Tremaine LLP
1301 K Street, NW
Suite 500 East
Washington, DC 20005
Tel: (202) 973-4295
Fax: (202) 973-4495
seanatkins@dwt.com
bradleymiliauskas@dwt.com

V. Service

The CAISO has served copies of this filing on the California Public Utilities Commission, the California Energy Commission, and all parties with scheduling coordinator agreements under the CAISO tariff. In addition, the CAISO has posted a copy of the filing on the CAISO website.

VI. Contents of this Filing

Besides this transmittal letter, this filing includes the following attachments:

Attachment A	Clean CAISO tariff sheets to implement this tariff amendment
Attachment B	Redlined CAISO tariff sheets to implement this tariff amendment
Attachment C	Board and Governing Body memorandum and resolution authorizing this tariff amendment

¹⁷ 18 C.F.R. § 385.203(b)(3).

VII. Conclusion

For the reasons set forth in this filing, the CAISO respectfully requests that the Commission accept this tariff amendment effective as of the implementation date specified herein.

Respectfully submitted,

/s/ John C. Anders

Roger E. Collanton
General Counsel
John C. Anders
Deputy General Counsel

California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630

Counsel for the California Independent
System Operator Corporation

Attachment A – Clean Tariff

Tariff Amendment – Inter-SC Trades of Energy in WEIM and EDAM BAs

California Independent System Operator Corporation

October 15, 2024

29.28 Inter-SC Trades

EIM Entity Scheduling Coordinators, EIM Sub-Entity Scheduling Coordinators, and EIM Participating Resource Scheduling Coordinators may submit only Inter-SC Trades of Energy for Real-Time Market transactions within an EIM Entity Balancing Authority Area in accordance with Section 28.

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33.28 Inter-SC Trades

EDAM Entity Scheduling Coordinators, EDAM Load Serving Entity Scheduling Coordinators, EDAM Resource Scheduling Coordinators and other Scheduling Coordinators in the Extended Day-Ahead Market may submit only Inter-SC Trades of Energy for Day-Ahead Market transactions within an EDAM Balancing Authority Area in accordance with Section 28.

Attachment B – Marked Tariff

Tariff Amendment – Inter-SC Trades of Energy in WEIM and EDAM BAs

California Independent System Operator Corporation

October 15, 2024

29.28 Inter-SC Trades

EIM Entity Scheduling Coordinators, EIM Sub-Entity Scheduling Coordinators, and EIM Participating Resource Scheduling Coordinators may ~~not~~ submit only Inter-SC Trades of Energy for Real-Time Market transactions within an EIM Entity Balancing Authority Area in accordance with Section 28.

* * * * *

33.28 Inter-SC Trades

EDAM Entity Scheduling Coordinators, EDAM Load Serving Entity Scheduling Coordinators, EDAM Resource Scheduling Coordinators and other Scheduling Coordinators in the Extended Day-Ahead Market may ~~not~~ submit only Inter-SC Trades ~~of~~ Energy for Day-Ahead Market transactions within ~~an outside the CAISO~~ EDAM Balancing Authority Area in accordance with, ~~and~~ Section 28 ~~will not apply to the Extended Day Ahead Market.~~

Attachment C – Board & Gov Body Memo and Resolution
Tariff Amendment – Inter-SC Trades of Energy in WEIM and EDAM BAs
California Independent System Operator Corporation
October 15, 2024



Memorandum

To: ISO Board of Governors and Western Energy Markets Governing Body
From: Anna McKenna, Vice President Market Design and Analysis
Date: September 19, 2024
Re: **Decision on Inter-SC Trades in Regional Markets**

This memorandum requires ISO Board of Governors and WEM Governing Body action.

EXECUTIVE SUMMARY

Management proposes to enhance the Extended Day-Ahead Market (EDAM) and the Western Energy Imbalance Market (WEIM) to include functionality that offers the ability to reflect bi-lateral energy arrangements between scheduling coordinators through the ISO settlement process. Separate from the energy purchases and sales made through the EDAM or WEIM, market participants may have bi-lateral contractual arrangements for the purchase and sale of energy, with associated payment obligations. The inter-SC trades functionality can be used to transfer monies associated with such obligations between parties through the ISO settlement services based on locational marginal prices cleared through the markets.

The inter-SC trades functionality is an optional settlement feature or service between scheduling coordinators. The settlements of such instruments do not affect the market optimization, market scheduling or dispatch of resources. This functionality is currently available to scheduling coordinators for trades within the ISO balancing area, but is not a feature currently available for trades within the WEIM or the EDAM.

Extending the functionality for inter-SC trades for energy to WEIM and EDAM balancing areas will provide market participants additional tools, options, and value to support settlement of bilateral contracts between scheduling coordinators in the WEIM and EDAM. The proposal was not opposed by any stakeholder. The extension of this functionality would be enabled in 2026.

Management recommends the following motion:

Moved, that the ISO Board of Governors and the WEM Governing Body approve the proposed extension of the inter-SC trades for energy feature to WEIM and EDAM areas, as described in the memorandum dated September 19, 2024, and

Moved, that the ISO Board of Governors and WEM Governing Body authorize Management to make all necessary and appropriate filings with the Federal Energy Regulatory Commission to implement the change proposed in this memorandum, including any filings that implement the overarching initiative policy but contain discrete revisions to incorporate Commission guidance in any initial ruling on the proposed tariff amendment.

BACKGROUND

Transactions for supply across the West are often executed through bilateral contracts, across different timeframes and at specified locations where the energy is exchanged, to support reliable load service. These bilateral arrangements, such as power purchase agreements between a generator and a load serving entity, may contain provisions about the disposition of market revenues associated with the bilateral transaction to the extent that the generation is bid in the market. When generation or load is offered in the market, the ISO provides market settlement with the respective scheduling coordinator representing the generation or load in the market.

Inter-SC trades serve as a settlement mechanism or service within the ISO's markets that can facilitate contractual arrangements, such as bilateral power purchase agreements, between scheduling coordinators by offsetting ISO settlement charges against contractual payment responsibilities. Through an inter-SC trade, the scheduling coordinator party to that trade may indicate to which scheduling coordinator and which locational price the market settlement should flow, in support of the out-of-market bilateral arrangements the parties may have in place.

Inter-SC trades are an optional market settlement feature or service. Scheduling coordinators are not required to effectuate inter-SC trades and can otherwise bilaterally and mutually settle any aspects of their bilateral contracts between themselves outside of the market. Importantly, inter-SC trades have no effect on market optimization, market scheduling or the dispatch of resources.

Currently, inter-SC trades and associated functionality is only supported for locations within the ISO balancing authority area and is not a feature for locations within the WEIM or future EDAM areas.

Some stakeholders have encouraged the ISO to consider extension of the inter-SC trade of energy functionality, including WEIM entities evaluating EDAM participation and respective settlement with their customers. Through a stakeholder process conducted this year, stakeholders showed that within the WEIM areas, inter-SC trades for energy provide an opportunity for market participants to effectuate inter-SC trades associated with participating resources and provide an optional tool to direct market settlement supporting bilateral power purchases. In EDAM, all resources in the balancing area are settled and offering the supply in the market along with load being able to bid in the market. Inter-SC trades of energy can provide further value to support settlements associated with bilateral contracts that may be in place between parties represented by scheduling coordinators.

For locations within the ISO balancing area, in addition to inter-SC trades for energy, the ISO also supports inter-SC trades for ancillary services and day-ahead load uplift obligations. At this time, Management is not proposing an extension of these types of inter-SC trades to EDAM or the WEIM locations. The market does not currently co-optimize ancillary services with energy, neither within the WEIM nor with EDAM at launch, so inter-SC trades of ancillary services are not useful outside of the ISO area. Management proposes to consider the extension of such inter-SC trades when evaluating co-optimization of ancillary service with energy within WEIM and EDAM. Management understands that inter-SC trades of the day-ahead load uplift obligation may be useful for EDAM participants. However, the extension of such service requires more extensive system changes, which Management remains open to consider beyond 2026.

Because the extension of inter-SC trades for energy to the WEIM and EDAM does not require significant system changes and can be incorporated within the scope of the EDAM implementation activities, Management expects this feature would be available to WEIM and EDAM areas in 2026. Through the implementation process, stakeholders will have the opportunity to thoroughly test the inter-SC trade for energy functionality, along with other EDAM features, during the extended market simulation period prior to EDAM implementation.

POSITIONS OF THE PARTIES

ISO staff prepared and posted a straw proposal and a draft final proposal and held stakeholder calls to review and discuss both. Stakeholders also submitted written comments on both the straw proposal and the draft final proposal.

Stakeholders support the proposal to extend this optional functionality of inter-SC trades for energy to WEIM and EDAM balancing areas. In written comments, all stakeholders including the Department of Market Monitoring, supported this proposed direction. Stakeholders noted that enabling inter-SC trades for energy within WEIM and EDAM areas will provide value as it will help facilitate settlement of certain aspects of bilateral contracts; that the functionality can support different business needs and market participation structures; and that inter-SC trades can help further integrate bilateral markets in the West.

Management appreciates the extensive stakeholder support for the proposal.

CONCLUSION

Management proposes to extend the inter-SC trades for energy to the WEIM and EDAM areas. All stakeholders support or do not oppose the proposed changes. Management recommends that the ISO Board of Governors and WEM Governing Body approve the proposal and related tariff changes as described in this memorandum.

Decision on Inter-Scheduling Coordinator Trades in Regional Markets

Motion

Moved, that the ISO Board of Governors and the WEM Governing Body approve the proposed extension of the inter-SC trades for energy feature to WEIM and EDAM areas, as described in the memorandum dated September 19, 2024, and

Moved, that the ISO Board of Governors and WEM Governing Body authorize Management to make all necessary and appropriate filings with the Federal Energy Regulatory Commission to implement the change proposed in this memorandum, including any filings that implement the overarching initiative policy but contain discrete revisions to incorporate Commission guidance in any initial ruling on the proposed tariff amendment.

WEM Govering Body vote: ISO Board of Governors vote:		Action: Passed 10-0						
Name	Position	Body	Move/ Second	Yes BoG	No BoG	Yes GB	No GB	Other
Borenstein	Vice Chair	Board		Y				
Campbell	Member	GB				Y		
Decker	Member	GB	Moved			Y		
Eto	Governor	Board		Y				
Galiteva	Governor	Board		Y				
Kondziolka	Chair	GB				Y		
Leslie	Governor	Board	Second	Y				
Prescott	Member	GB				Y		
Schori	Chair	Board		Y				
Wagner	Vice Chair	GB				Y		
Vote Count				5		5		