

**Powerex Comments
Supporting WPTF Comments Regarding CAISO EIM Readiness Criteria**

Submitted by	Company	Date Submitted
Mike Benn 604.891.6074	Powerex Corp.	May 21, 2015

Powerex appreciates the opportunity to submit comments in response to CAISO's EIM Readiness Criteria that were published on May 6, 2015.

Powerex fully supports the comments submitted by the Western Power Trading Forum on May 21, 2015 regarding the EIM Readiness Criteria. Specifically, Powerex supports WPTF's positions that the Readiness Criteria and testing thresholds should be revised to ensure that they are

- specific and quantifiable;
- rigorous; and
- comprehensive.

Powerex further supports WPTF's suggested revisions. The suggested revisions are the bare minimum necessary to ensure that the EIM Readiness Criteria (1) comply with FERC's March 16, 2015 order issued in Docket Nos. ER15-861-000 and EL15-53-000 and (2) enable future EIM Entities to avoid the same kinds of unjust and unreasonable results that FERC and CAISO have acknowledged in the first several months of EIM operations.