

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your comments on the Energy Imbalance Market Draft Final Governance Proposal and Draft Charter posted on November 7. Submit comments to EIM@caiso.com. **Comments are due November 25, 2013 by 5:00pm**

Draft Final Governance Paper:

http://www.caiso.com/Documents/DraftFinalGovernanceProposal_EnergyImbalanceMarket.pdf

Draft Final Charter:

http://www.caiso.com/Documents/DraftFinalTransitionalCommitteeCharter_EnergyImbalanceMarket.pdf

SMUD appreciates the opportunity to provide these comments to the CAISO's Draft Final Governance Proposal.

- 1. Do you support the change in the schedule for the sector nomination and ranking process and for establishing membership of the Transitional Committee? Please explain the basis for your views.**

Comments:

While SMUD has no strong opinion as to the CAISO's logistical decision to change the initial sector discussion from a meeting to a teleconference, we believe the protracted timeline for the appointment and seating of the Transitional Committee only further limits the input from the committee prior to the October 2014 start-up.

2. Do you support the clarification of the ranking process and the qualifications for the Transitional Committee membership? Please explain the basis for your views.

Comments:

SMUD has maintained that it would be best to ensure that each sector is represented on the Transitional Committee. Moreover, given the diversity within each of these sectors and the workload envisioned for the committee, more than one representative should be allowed. The Draft Final Governance Proposal does not reflect either of these concepts. Should biasing of decisions occur to the detriment of an unrepresented sector (or sectors), this will only undermine the overall credibility of the Transitional Committee.

3. Do you have any comments on the draft final charter? Please explain.

Comments:

In its previous comments, SMUD requested more details as to the stakeholder process for the development of an EIM long-term governance structure. While SMUD appreciates that the CAISO has provided an additional sentence reflecting the “iterative” nature of the development process, additional details as to expectations and parameters should be reflected in the charter. More specifically, some emphasis should be added that the proposal will be developed through an “open stakeholder review and input process similar to the stakeholder initiative process currently used by CAISO staff in developing proposals for the Board.”

4. Do you have any additional comments not covered above on the changes made in the draft final governance proposal?

Comments:

None at this time.