

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide written comments on the EIM Governance straw proposal posted on March 19, 2015.

[Please submit comments to EIM@caiso.com](mailto:EIM@caiso.com) by close of business April 16, 2015

The straw proposal is available on the ISO website at:

http://www.caiso.com/Documents/StrawProposal-LongTermGovernance_EnergyImbalanceMarket.pdf

The slides presented during the March 31, 2015 stakeholder meeting are available at:

http://www.caiso.com/Documents/Agenda_EnergyImbalanceMarketGovernance-StrawProposal.pdf

The EIM Transitional Committee welcomes and appreciates stakeholder feedback related to the straw proposal for the EIM Governance initiative. Please use the following template to comment on the key topics addressed in the proposal:

<p>Structure - composition of the Nominating Committee, composition of the EIM governing body, and process for selecting members.</p>
<p>Scope of authority – scope of authority, including whether it is appropriate and workable, the examples of issues that would fall within the primary and secondary authority of the EIM governing body, and process for resolving disagreements about the particular proposed rule changes or the scope of authority generally.</p>
<p>Comment:</p>

Documentation – documentation of these arrangements in the ISO’s bylaws and a charter from the ISO Board of Governors, and mission of the EIM governing body that would be identified in its charter
Comment:
Committee of regulators – composition, including the balance of representation between state commissions and public power, and role of the committee
Comment:
Trigger for re-evaluating EIM governance
Comment:
Criteria for evaluating proposals – to revise and simplify the criteria for evaluating governance proposals, as reflected in the appendix
Comment:
Miscellaneous items – Please provide comments to other aspects of the straw proposal or governance related issues here.
<p>Thank you for the opportunity to comment on the California ISO’s EIM Transition Committee’s March 19th 2015 Straw Proposal for Long-Term Governance of the Energy Imbalance Market (“CAISO”, “Committee” and “Straw Proposal”).</p> <p>Avista Corporation (“Avista”) encourages the Committee to reconsider its conclusion that an autonomous governance model is incompatible with the CAISO’s EIM offering. An autonomous governance model is Avista’s -preferred strategy.</p> <p>The Straw Proposal recognizes the existing legislation may need to be revised to enable the autonomous governance model. Avista encourages the Committee to consider those changes now as part and parcel to creating an EIM with autonomous governance that would be more universally appealing to neighboring Balancing Authorities.</p>