

**ALPERN MYERS STUART LLC**  
ATTORNEYS AT LAW

*Howard J. Alpern*  
*Kenneth P. Myers*  
*Dan D. Stuart*  
*Lisa Tormoen Hickey*  
*Matthew J. Werner*  
*Virginia V. Koulchitzka*  
*John L. Cyboron*  
*Gregory M. O'Boyle*

**14 NORTH SIERRA MADRE STREET, SUITE A**  
**COLORADO SPRINGS, COLORADO 80903-3311**

---

TELEPHONE (719) 471-9231

E-MAIL: [lisahickey@coloradolawyers.net](mailto:lisahickey@coloradolawyers.net)

*Of Counsel*  
*M. Allen Ziegler, Jr.*

*Senior Associate*  
*Peggy A. Hayes*

January 26, 2015

Stacey Crowley  
Director, Regional Affairs  
CAISO  
250 Outcropping Way  
Folsom, CA 95630  
EIM@caiso.com

Re Conceptual Governance Models for the Energy Imbalance Market

Dear Ms. Crowley:

The Interwest Energy Alliance (“Interwest”) appreciates the opportunity to provide comments regarding the January 5, 2015 issue paper prepared by the EIM Transitional Committee on Conceptual Models for Governing the Energy Imbalance Market. Interwest is a nonprofit trade association made up of business members including the leading wind and utility-scale solar developers working with non-governmental conservation groups to promote renewable energy throughout the Intermountain West. Several states within the Interwest region are now included in the CAISO-PacifiCorp EIM operations. Interwest has been a strong advocate for the expansion of energy imbalance markets in its state and regional regulatory activities.

Interwest supports elements of the second conceptual model, the creation of an EIM governing body with authority delineated under CAISO’s bylaws. Interwest believes this model could honor existing institutional roles and market responsibilities, provide for transparency and accountability, and allow for ease of participation, which will promote the EIM expansion overall.

Interwest supports the development of regional energy markets, and the governing body should be empowered to develop the EIM and integrate five- and 15-minute markets throughout the West.

Interwest encourages creation of an associated advisory committee to the governing body that would provide state regulators with a forum for them to learn more about the EIM and to provide input on specific issues related to its implementation. The advisory committee will also build transparency and promote confidence in the EIM and its governing body.

ALPERN MYERS STUART LLC

January 26, 2015  
Page 2 of 2

Thank you again for this opportunity to submit comments on behalf of the Interwest Energy Alliance.

Very Truly Yours,

ALPERN MYERS STUART, LLC

A handwritten signature in black ink, appearing to read 'LTH' with a stylized flourish.

By: Lisa Tormoen Hickey

cc: Sarah Cottrell Propst, Executive Director