

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
Kris Mayes <a href="mailto:kmayes@krismayeslaw.com">kmayes@krismayeslaw.com</a> 602-757-7434	Interstate Renewable Energy Council (IREC)	October 25, 2013

Please use this template to provide your comments on the Energy Imbalance Market Revised Governance Proposal and Draft Charter posted on October 4. Submit comments to [EIM@caiso.com](mailto:EIM@caiso.com). **Comments are due October 25, 2013 by 5:00pm**

Revised Governance Paper:

<http://www.caiso.com/Documents/RevisedGovernanceProposal-WhitePaper-EnergyImbalanceMarket.pdf>

Draft Charter:

<http://www.caiso.com/Documents/TransitionalCommitteeDraftCharter-EnergyImbalanceMarket.pdf>

Please provide your comments following each of the topics listed below:

- 1. Do you support the sector definitions and the nomination and ranking process for the Transitional Committee? Please explain the basis for your views.**

Comments: Yes. IREC largely supports the nomination and ranking process for the Transitional Committee. In particular, we appreciate the decision of Staff to propose raising the number of Committee members from seven to nine, which we believe will enhance the ability of CAISO to attract additional regions and utilities into the EIM effort. Similarly, we agree with the decision to allow two additional members for the Committee, based on the membership of the first two additional entities to join the EIM. However, we would encourage CAISO Staff to consider allowing up to four new members based on new EIM membership, or even one member for each new state that has a utility join the EIM.

We are also supportive of splitting public interest entities and governments into two separate sectors, as this will improve the ability of CAISO to reach out to multiple states and

the Governors and Public Utility Commissions for their involvement and input into the process. We are convinced that Western States will ultimately see the value in EIM, and that CAISO should make every possible effort to reach out to them. We are aware that CAISO has hired a regional manager for EIM, and we support that decision.

IREC has one concern with regard to the process of selecting the Transitional Committee: to the degree that the ISO Board is not required to choose one member from each sector, it may result in a Transitional Committee that is not completely reflective of the various stakeholder groups that are interested in EIM. It would be unfortunate if stakeholder groups devoted resources and time to the CAISO process, only to find that their efforts were for naught. We recommend that CAISO Staff consider amending its proposal to require that each sector receive representation on the Committee. Additionally, we are concerned that the process identified by Staff, in which the sectors will each rank one another's members, followed by the submission of a single list to the ISO Board, could result in a ranking that is somewhat skewed. Again, we recommend that the rankings be done by each sector, and that each sector receive representation on the Transitional Committee. If this is not possible, then IREC recommends that the ISO Board find some other way to ensure each sector that its interests will be represented on the Transitional Committee.

**2. Do you support the roles identified for the Transitional Committee and the decision-making processes for the committee outlined in the revised governance proposal and draft charter? Please explain the basis for your views.**

Comments: Yes.

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

Comments:

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

Comments: IREC reiterates its hope that the ISO Board will strongly encourage Transitional Committee meetings and other related activities occur at least occasionally outside of the state of California in order to facilitate the widest possible understanding and acceptance of the EIM initiative.