


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 Governance White Paper posted on August 13.

Submit comments to EIM@caiso.com

[Comments are due September 6, 2013 by 5:00pm](#)

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

- 1. Do you support the roles identified for the transition committee – i.e., to provide the Board with input on EIM-related issues during start-up and early implementation and to develop a proposal for an independent governance structure? Please explain the basis for your views.**

Comments:

Iberdrola supports the proposed formation of a Transitional Committee and the identified roles are appropriate. Clarification of how the Transitional Committee process will interact with the traditional stakeholder process would be helpful. Specifically, will the recommendations of the Transitional Committee to the ISO Board be deemed as a representation of all stakeholders or will there be an opportunity for stakeholders outside of the Transitional Committee to have input on the proposed recommendations?

- 2. Do you support the sector definitions and the nomination and ranking process for the transition committee? Please explain the basis for your views.**

Comments:

Iberdrola supports the existing sector definitions and ranking process but would not be opposed to splitting the government agencies and public interest entities into separate sectors and creating an eight member Transitional Committee.

3. Do you support the number of members in the transition committee and its composition? Please explain the basis for your views.

Comments:

The number of members in the transition committee and its composition seem appropriate. As expressed above, Iberdrola would not be opposed to designating government agencies and public interest entities as separate sectors if representatives from those entities feel it is necessary.

4. Do you support the independence proposals identified in the paper for long-term independent EIM structure? Please explain the basis for your views.

Comments:

Iberdrola supports the proposed process for development of the independent EIM governance structure. A fully independent structure will be critical to enable maximum participation from eligible entities in the long-term.

5. Are there details not covered here that you would suggest be included in the next round that will include a draft charter?

Comments:

6. Any other comments?

Iberdrola commends the CAISO for its diligent efforts to engage stakeholders in the development of its Energy Imbalance Market governance structure and looks forward to actively participating in the process.