

## 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 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: No. The sector definitions exclude non-Investor Owned Utility (“IOU”) Load Serving Entities (“LSEs”), namely community choice aggregators (“CCAs”) and electric service providers (“ESPs”). CCAs and ESPs reliably serve their loads, meet Resource Adequacy (“RA”) and Renewable Portfolio Standards (“RPS”) requirements, and are active buyers and sellers in CAISO markets. MEA serves approximately 125,000 accounts throughout its service territory. Though MEA is the only CCA currently operational, other CCAs including the Sonoma Power Authority (“SPA”) and CleanPowerSF are progressing through the necessary implementation steps and aim to launch service within the next year.

<sup>1</sup> MEA is the only operational Community Choice Aggregator (“CCA”) within California. MEA is the joint powers not-for-profit public agency authorized to administer the MCE Clean Energy (“MCE”) CCA program. MEA currently serves customers throughout Marin County and the City of Richmond. MEA provides generation services to approximately 125,000 accounts.

By excluding CCAs and ESPs, the Revised Governance Proposal would deny direct representation for significant segments of the California market. Accordingly, MEA requests that the definition of Sector #3, “Generators and Marketers,” be revised as follows to ensure that competitive retail providers are represented within the Sector definitions:

*Generators and marketers:* Generators and marketers are entities that engage in the wholesale **or retail** purchase or sale of electric energy or capacity. Entities may participate in this sector without regard to the fuel source of the underlying generation.<sup>2</sup>

- 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: MEA has no comments on this topic at this time.

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

Comments: MEA has no comments on the draft charter at this time.

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

Comments: MEA has no additional comments at this time.

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<sup>2</sup> Revised Governance Proposal, p. 12.