Contact Information Lea Fisher and Alex Swerzbin Public Generating Pool and PNGC Ifisher@publicgeneratingpool.com 541-231-5019 Oct 6, 2021

# Q1

What should the GBME's primary focus be?

- Governing Body and Stakeholder Engagement
- The EIM GBME should provide presentations and advice to the EIM GB and stakeholders regarding: Existing market design, including but not limited to the design, application and performance of resource
- sufficiency requirements, local market power mitigation, GHG costs (where applicable), and price formation. Analysis of how market design choices in the future EDAM initiative impact prices and dispatch across the footprint.
- Analysis/Reporting

o The EIM GBME should prepare opinions on proposed market design or other rule changes, including their relative impact on differently situated participants or market sub-regions. The EIM GBME should also prepare opinions, when requested by the governing body, on analyses or reports prepared by CAISO staff, DMM or the MSC.

o The EIM GBME should prepare periodic assessments on the Energy Imbalance Market, with a priority focus on key issues including the the function of and compliance with resource sufficiency requirements as well as transmission made available to the market, congestion and wheel throughs for external entities.

 The EIM GBME should also conduct analysis on issues identified and requested by the EIM Governing Body.

#### Q2

What criteria, if any, should the Governing Body apply in deciding whether to request a GBME opinion on a particular matter?

Below is a suggested list of criteria that PGP believes could be helpful for the Governing Body to consider when deciding whether to request a GBME opinion on a particular matter.

• EIM entities/other stakeholders have asked the Governing Body to consider requesting the EIM GBME issue an opinion on a particular matter.

The issue addresses key topics of interest/importance to EIM entities and/or other stakeholders, including: o Application and performance of resource sufficiency requirements

- o Local market power mitigation
- o GHG accounting
- o Price formation
- o Settlement errors/issues
- The issue will have different impacts on differently situated market participants.

• The issue affects or could impact the pricing or dispatch outcomes in CAISO's markets.

## Q3

How do you envision the GBME supporting the Governing Body in its decision-making process?

PGP recommends that the EIM GBME provide analysis on issues identified by the Governing Body, including issues in active stakeholder proceedings, and provide information through presentations, reports and opinions. The analysis and the information offered to the EIM Governing Body are expressly designed to support the Governing Body in its decision-making processes as well as helping EIM entities and other stakeholders develop policy positions.

Page 3: Key Qualifications and Criteria for Selecting the GBME

# Q4

What additional credentials or criteria, if any, should the Governing Body consider in selecting an individual who can successfully fulfill this role?

In addition to ensuring the GBME individual or consulting firm have deep expertise in energy markets and be free of conflicts of interest in order to ensure its independence, PGP suggests the following qualifications:

- Broad perspective and understanding of various organized market constructs, preferably with specific experience in more than one U.S. organized market construct.
- Has technical expertise and ability to process large amounts of data and evaluate complex technical topics and has the bandwidth/staffing to develop technical, substantive reports and analyses in a timely manner.
- Deep knowledge of OATT framework/bilateral markets, preferably in the Western Interconnection.
- Formal experience as an expert in FERC tariff proceedings.
- Reputation for objective and thorough analysis and information.

## Page 4: Interaction with Stakeholders and the Stakeholder Process

## Q5

# Do you have any thoughts on how the EIM GBME could most effectively engage with stakeholders?

- The broader stakeholder community should have access to EIM GBME opinions and reports which should be posted publicly.
- PGP also recommends that the EIM GBME hold regularly scheduled meetings (perhaps quarterly) during which it would present results of its most recent analyses and answer stakeholder questions.