



EIM Governance Review Committee Draft Final Proposal

**Public Generating Pool Comments
June 11, 2019**

The Public Generating Pool (PGP)¹ appreciates CAISO's efforts on this important stakeholder process and the opportunity to comment on the Energy Imbalance Market (EIM) Governance Review *Draft Final Proposal for Formation of an EIM Governance Review Committee* dated May 21, 2019. PGP is generally supportive of the Draft Final Proposal and offers considerations for the EIM Governance Review Committee nomination and selection process.

I. SECTOR DEFINITIONS

PGP supports these sector definitions for the purposes of establishing an EIM Governance Review Committee only and believes they should not set precedent for sector definitions in other contexts such as the Regional Issues Forum, the Nominating Committee, and any potential future stakeholder advisory committee that may be considered.

II. PROPOSED NON-VOTING, ADVISORY ROLES

PGP thanks CAISO for its responsiveness to our comments in moving the role of the EIM Governing Body and ISO Board Governance Review Committee members to non-voting, advisory, noting that these members are decision-makers of EIM market rules and EIM Governance. PGP does not see the same conflict for the Body of State Regulators (BOSR) and would support the BOSR having a voting role if the BOSR determines that it is appropriate for them.

III. GOVERNANCE REVIEW COMMITTEE MEMBERSHIP

When selecting nominees for the EIM Governance Review Committee, we encourage the EIM Governing Body and ISO Board of Governors to ensure diverse representation. In the CAISO's consideration of the candidates, we offer the following considerations:

- There is a difference between Federal Power Marketing Agencies and the consumer-owned utilities that are served by or are in the balancing authority area of a Federal Power Marketing Agency. Federal Power Marketing Agencies should not be assumed to represent those consumer-owned utilities.
- Consumer-owned utilities inside and outside California have different perspectives on governance, and it is important to ensure California and non-California consumer-owned utility representation.

¹ PGP represents ten consumer-owned utilities in Oregon and Washington that own almost 6,000 MW of generation, 4,500 MW of which is hydro and 95% of which is carbon-free. Three of the PGP members operate their own Balancing Authority Area (BAA), while the remaining members have service territories within the Bonneville Power Administration's (BPA) BAA.

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