Comments of the Public Power EIM Entities

EIM Governance Review: Draft Final Proposal for Formation of an EIM Governance Review Committee

In accordance with the procedures specified by the California Independent System Operator Corporation ("CAISO"), the Balancing Authority of Northern California/Sacramento Municipal Utility District ("BANC/SMUD"), Los Angeles Department of Water and Power, Salt River Project and Seattle City Light ("Public Power EIM Entities") provide these comments on the Governance Review Committee ("GRC") Draft Final Proposal.

The Public Power EIM Entities support the CAISO's approach and support the Draft Final Proposal. The Draft Final Proposal addresses a number of points raised by the Public Power EIM Entities and the comments of the EIM Entity group as a whole, including creation of a new sector to better address entities still considering the EIM, explicit recognition of realistic timelines for executing the GRC scope of work, and clarifying the role of the CAISO Board of Governors and the EIM Governing Body on the GRC as advisory only.

The Public Power EIM Entities also are comfortable with the other changes to clarify the potential scope of GRC work, and the desire to ensure a smaller minority of GRC members may trigger the issuance of a Minority Opinion.

All in all, the Public Power EIM Entities commend the CAISO for balancing the comments of multiple sectors and from the geographically diverse footprint that comprises the EIM. We look forward to working with the CAISO, stakeholders, the EIM Governing Body, and the CAISO Board of Governors to properly constitute the GRC in order for it to commence its activities later this year.