

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
Cameron Yourkowski Senior Policy Manager <a href="mailto:Cameron@rnp.org">Cameron@rnp.org</a> 971-634-0143	Renewable Northwest Project	9-6-2013

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](mailto: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:

*Yes, we view the transition committee as an efficient and balanced approach, allowing the EIM to get up and running while at the same time working to design an effective and independent governance structure. The transition committee approach will also allow any new issues that arise during the implementation and initial operation of the EIM to be addressed through the design and formation of the final governance structure.*

- 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:

*RNP has no experience with the CAISO's "sector self-nomination process;" as such, we look forward to learning more about this process, how the sectors self-organize, and the role of the sector liaisons. With respect to the definitions of the sectors themselves, as a public interest entity, we offer that government agencies and public interest entities*

*represent two distinct stakeholder groups. We suggest each have their own representation on the transition committee. Also, unless we missed it, there does not appear to be an explicit requirement to ensure regional diversity among the transitional committee representatives. A broad WECC-wide representation will improve the independence of the process and the attractiveness to potential EIM participants from around the WECC.*

**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 on the transition committee may need to be expanded per our comments in number two, above.*

**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:

*RNP strongly supports an independent EIM governance structure. We believe the independence of the governance structure is fundamental to the ultimate success of the EIM. As you are well aware, the more participants the EIM attracts, the broader the EIM footprint, the more diversity in load and generation patterns, the more valuable the EIM is to consumers, WECC-wide. The independence and the effectiveness of the EIM governance structure may be the primary concern of some utilities considering whether or not to join the EIM in the future.*

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

Comments:

*No additional comments.*

**6. Any other comments?**

*No.*