

**COMMENTS OF THE
TRANSMISSION AGENCY OF NORTHERN CALIFORNIA
ON THE CAISO'S ENERGY IMBALANCE MARKET GOVERNANCE PROPOSAL**

September 6, 2013

The Transmission Agency of Northern California (TANC) appreciates the opportunity to provide comments on the California Independent System Operator's (CAISO) August 13, 2013 Energy Imbalance Market (EIM) Governance Proposal.

In the Governance Proposal, the CAISO uses the terms "EIM market participant" and "EIM stakeholder." Given the use of defined terms in the EIM Straw Proposals, as well as the evolution of various definitions, the CAISO's Revised Governance Proposal should further identify and define the terms "EIM market participant" and "EIM stakeholder."

Also, there appears to be a fair amount of ambiguity regarding the role of the EIM Transitional Committee and the CAISO Board regarding the development, selection, and ultimate function of the independent EIM governance. Accordingly, TANC requests the CAISO to specify these roles in the Draft Charter and/or Revised Governance Proposal in order to help provide clarity regarding the development of the independent EIM governance structure.