

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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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

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: TID believes the roles assigned to the EIM Transition Committee are correct and the CAISO should direct this committee to complete its work and move toward the formation of an independent EIM Board of Governors as soon as possible. TID believes that the CAISO should give deference to all suggestions, proposals, and comments made to the CAISO in regards to structure, form, and operation of the regional EIM Market.

- 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: TID believes the nomination and ranking process is appropriate and will yield the appropriate outcome of a functional EIM Transition Committee

3. Do you support the number of members in the transition committee and its composition? Please explain the basis for your views.

Comments: TID believes the number of members will allow for sufficient representation of all sectors on the EIM Transition Committee. TID believes that of the seven potential members, the CAISO should strive to ensure that one member maintain a firm foundation of knowledge from each of the defined sectors; i.e. one member have extensive experience in the Publicly Owned Utility sector, another member being from the Investor Owned Utility sector... to ensure that the viewpoints of all sectors are represented well.

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: TID supports the independence of the EIM Board of Governors. TID believes the CAISO should leave the selection of initial and ongoing EIM Board of Governors nominations up to EIM Participating Entities. It is inappropriate for a California entity to make the appointments to a regional board, and those entities with a direct stake in the EIM market should have a direct say in its governance.

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

Comments: TID cautions against implementing too many CAISO-centric EIM initiatives. If the intended result is an independent regional EIM Board of Governors, the board and its policies must maintain enough objectivity and flexibility to accommodate EIM consistently across the entire WECC region. TID instead recommends the CAISO seek out a construct more akin to a durable contractual arrangement between the EIM and

the CAISO. This would allow the EIM to take advantage of the infrastructure of the CAISO and allow the CAISO to reduce the total costs of the CAISO infrastructure to existing participants.

6. Any other comments?

TID appreciates the opportunity to make comments on the CAISO Energy Imbalance Market Governance Proposal. TID believes that once the EIM Board of Governors is fully autonomous, it is important that all EIM Entities interact with the EIM Board of Governors on equal footing. If EIM is to achieve regional adoption, participating entities must interact with equal deference and standing.