

## Western Area Power Administration's Comments on CAISO's EIM Proposal

Enclosed for your consideration are the latest comments from Western Area Power Administration on the CAISO's EIM straw proposal(s). Western reserves its right to provide additional comments on subsequent EIM straw proposal modifications as they may occur in the future.

1. Based on Western's understanding of what was presented by the CAISO at the stakeholder meetings, the minimum eligibility requirements for an EIM entity is a NERC-registered balancing authority area. Could you please confirm that this is true?
2. As an owner and operator of over 17,000 miles of high voltage transmission lines, Western believes it is imperative that it be compensated whenever any excess transmission capacity is used by others in the furtherance of EIM activities (i.e., no free transmission), and furthermore, that whenever such transmission capacity is used, that such usage is properly tracked and accounted for.
3. Western believes that EIM should not cause any valid forward energy schedules to be curtailed. Western seeks clarification from the CAISO regarding EIM's usage of an EIM Entity's transmission capacity. By becoming an EIM entity, what portion of the EIM entity's transmission capacity must the EIM entity make available to the CAISO EIM? What physical priority would the EIM Entity have in using its transmission capacity for its EIM base-schedule and non-EIM energy schedules? If an EIM entity's Base-Schedule and non-EIM Schedules are within the scheduling limits of its internal paths and at the interties according to the EIM Entity's own congestion management protocol, but the CAISO EIM shows congestion on the EIM entity's facility because of "loop flows" caused by resources of other entities in the CAISO EIM footprint, what scheduling priority protection is afforded to the non-EIM-schedules on the EIM Entity's own transmission? In Section 3.4.2 Congestion Management of the 3rd revised proposal, it is stated that "transmission constraints will be relaxed ... and the EIM Entity will become responsible for managing its congested constraints ..." Does the CAISO expect the EIM Entity to curtail its forward energy schedule on its own transmission facility to accommodate EIM power flow or deny the tags of the EIM power flow?
4. Western believes that the nomination and appointment process for both the transition and the permanent governing committee should be structured to ensure that the self-nominated members are appointed by the CAISO Board in an open, fair, and transparent manner. It is critical that the governing board is truly independent and representative of all parties involved in EIM today and into the future.

