

BPA Comments on Proposed Guidance for Handling Policy Initiatives within the Decisional Authority or Advisory Role of the EIM Governing Body

Submittal Date: October 18, 2016

Submitted by: Suzanne Cooper

OVERVIEW

The Bonneville Power Administration (“BPA”) appreciates the opportunity to comment on the California Independent System Operator (“CAISO”) Energy Imbalance Market (“EIM”) Governing Body proposed Guidance for Handling Policy Initiatives within the Decisional Authority or Advisory Role of EIM Governing Body (“Proposal”). BPA has a keen interest in the efficient operation of the EIM – BPA serves load inside multiple EIM Balancing Authority Areas and BPA is a transmission provider for many EIM Participating Resources and loads in the EIM footprint. BPA is generally supportive of the Proposal and would encourage the EIM Governing Body to further consider how to integrate feedback from the EIM Regional Issues Forum (“RIF”). The RIF can provide valuable input to the EIM Governing Board on policy initiatives and the state of EIM operation. For some parties, including non-jurisdictional entities like BPA, the RIF is the best forum to provide such input and formulate regional perspectives on EIM policies and operations.

COMMENTS

BPA believes that the Proposal effectively implements the authority that is granted to the EIM Governing Body under the CAISO tariff. BPA encourages the EIM Governing Body and the CAISO Board to maintain the ability for the EIM Governing Body to independently represent the interests of the EIM Participants and all the stakeholders that are impacted by the EIM policies and operations. Such action will demonstrate a helpful road map for creation of an independent governance structure for the Western ISO.

In addition, BPA encourages the EIM Governing Body to contemplate the role of the RIF in providing input to the policy, system operations, and pricing and settlement processes. The RIF generally provides a forum for EIM stakeholders to share and discuss issues arising from EIM operations and the EIM’s relationship to other ISO market designs and settlement processes. As such, this forum can prove invaluable to the EIM Governing Body as it considers CAISO policy proposals and in identifying new issues. The RIF represents many utility sectors and brings diverse perspectives that the EIM Governing Body could leverage in its decision-making processes. BPA encourages the EIM Governing Body to articulate how it will consider comments and input from the RIF.

Once again BPA appreciates the opportunity to provide these comments.

