



Department of Energy

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**Governance Review Committee Scoping Paper
Comments Submitted by Bonneville Power Administration, February 21, 2020**

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Bonneville Power Administration¹ (Bonneville) appreciates the opportunity to comment on the Scoping Paper proposed by the Governance Review Committee (GRC). The nature and number of questions posed by the GRC illustrate the high degree of interest and the diversity of perspectives that the GRC must consider. Given the GRC will next develop a proposal for further comment for the subsequent generation of EIM governance, Bonneville’s comments herein are advanced as alternatives representing a broad spectrum of options the GRC may contemplate.

In addition to these comments, Bonneville has joined the EIM Entities comment. While Bonneville supports most of the concepts in the EIM Entities comment, it is worth noting that Bonneville did not participate in the development of the EIM Entity Straw Proposal that is attached to the EIM Entities comment and Bonneville does suggest some different alternatives for the GRC to consider in the comment below.

Issue 1: The Delegation of Authority for Market Rules to the EIM Governing Body and the Decisional Classification Process

A. The Scope of Delegation to the Governing Body

¹ Bonneville is a federal power marketing administration within the U.S. Department of Energy that markets electric power from 31 federal hydroelectric projects and some non-federal projects in the Pacific Northwest with a nameplate capacity of 22,500 MW. Bonneville currently supplies 30 percent of the power consumed in the Northwest. Bonneville also operates 15,000 miles of high voltage transmission that interconnects most of the other transmission systems in the Northwest with Canada and California. Bonneville is obligated by statute to serve Northwest municipalities, public utility districts, cooperatives and then other regional entities prior to selling power out of the region.

1. Are there any changes that should be made to the scope of delegation even if EDAM is not established? If so, what changes would stakeholders propose?

Bonneville is encouraged by the breadth of EIM governance issues the GRC has presented in its Scoping Paper, and the timely nature of this review. Bonneville focuses its comments below on four primary themes to address even if EDAM is not established:

- Expand the EIM Governing Body's primary authority.
- Improve the durability of the current EIM governance structure and its ability to adapt to expanded market functions.
- Increase the EIM Governing Body's influence over the development of policy initiatives and staffing priorities.
- Provide comparable representation for federal PMAs and public power interests in the EIM governance structure and appropriate participation by non-utility interests.

The GRC's consideration of key changes in these areas will help demonstrate its commitment to an independent, transparent, and inclusive EIM governance structure.

Bonneville believes that the EIM Governing Body's primary authority should extend to all generally applicable real-time market rules regardless of the driver for the change, except for those changes that have no material effect on the EIM or the EIM Balancing Authority Areas. Because the ISO's broader real-time market and the EIM have common market rules, IT platforms, staff, and operational protocols, almost any change to the real-time market has an effect on the EIM or the EIM Balancing Authority Areas. Similarly as addressed below, if the ISO extends the day-ahead market beyond the existing ISO footprint, the extended day-ahead market and associated IT platforms, staff, and operational protocols should fall within the EIM Governing Body's primary authority.

Currently, EIM policy initiatives, as well as the content and agendas of EIM Governing Body meetings, are developed, organized, and conducted by ISO staff. This paradigm can dilute the independence and transparency of the EIM Governing Body's decision-making and agenda-setting roles.

Bonneville recommends expanding the role of the EIM Governing Body, with advisory input from the Committees, to develop and recommend initiatives that would fall within its primary authority.

Bonneville also recommends that the EIM Governing Body, with advisory input from the Committees, be given greater autonomy over the development of its meeting agendas. Currently, ISO staff determines which topics are considered by the EIM Governing Body as well as their priority in deliberations. This leaves members, stakeholders and regulatory authorities with very limited ability to influence the substance of EIM policy initiatives. Bonneville believes that expanding the development of topics for the EIM Governing Body meetings to a broader review will provide a venue for those entities to raise potential issues and advance solutions that are currently unavailable in the ISO's public processes.

2. Assuming EDAM does go forward, what impact does this have on the scope of market rules that should be delegated by the Board?

Bonneville believes that the EDAM Governing Body's primary authority should extend to all generally applicable real-time and day-ahead market rules regardless of the driver for the change, except for those changes that have no material effect on the EDAM or the EDAM Balancing Authority Areas. Because the ISO's broader real-time and day-ahead markets and the EIM and EDAM share common market rules, IT platforms, staff, and operational protocols, almost any change to the real-time and day-ahead market changes have an effect on the EDAM or the EDAM Balancing Authority Areas. However, this would not extend the EDAM Governing Body's authority to items that would remain jurisdictional to the States in the EDAM footprint such as transmission planning and resource adequacy planning, and it would not extend to other NERC functions such as the Reliability Coordinator or Transmission Service Provider functions.

3. Whether or not EDAM goes forward, should the scope of the Governing Body's primary authority be defined with an objective "bright-line" rule that provides more definitive instructions than the current rules? (As structured today, a determination is based on whether a market rule is "EIM-specific" and on whether EIM is the "primary driver" for a proposal to change market rules.) If so, what should the more objective criteria be?

Bonneville offers alternatives for consideration in response to this question:

Alternative 1: Expand the Scope of EIM Governing Body's Primary Authority

As discussed above, the scope of the EIM Governing Body's primary authority should expand to encompass all generally applicable real-time market rules, regardless of the driver for the change, except for those changes that have no material effect on the EIM or EIM Balancing Authority Areas. While "material effect" is not an objective "bright-line" rule, as a practical matter, this expanded scope would reduce potential "close calls" in designating an issue within the primary authority. While this expanded scope would give the EIM Governing Body the ability to consider additional relevant issues, it would not remove the ISO Board of Governors' oversight authority. The ISO Board of Governors would retain the authority to approve or reject any rule changes within the EIM Governing Body's primary authority on a consent agenda basis.

Below, Bonneville discusses a proposal to create various advisory Committees. Under this paradigm, issues raised by these committees should be presumed to be within the EIM Governing Body's primary authority. The fact that such committees would devote resources to prioritize an issue would demonstrate that the issue is of special concern to the EIM market and to EIM Balancing Authority Area participants. If ISO Staff disagreed with the presumptive designation of a given issue, it could seek to re-designate the issue, but would bear the burden of justifying its decision. Conflicts would continue to be addressed through the existing procedures.

Alternative 2: Explore Framework for Joint Authority

Another proposal would be to create a new category of joint authority between the EIM Governing Body and ISO Board of Governors. Joint authority could encompass a defined subset of issues or all generally applicable real-time market rules (and, for EDAM, all day-ahead market rules), regardless of the driver for the change. The EIM Governing Body's primary authority would apply to issues that have no material effect on the full ISO market. The Board of Governors would retain complete authority over all issues that have no material effect on the EIM or EIM Balancing Authority Areas. The Board of Governors could also retain the authority to approve or reject any rule changes within the EIM Governing Body's primary authority on a consent agenda basis.

Bonneville proposes that ISO Staff continue to make initial classification determinations. However, if both the EIM Governing Body and ISO Staff assert an interest in an issue, then it should be reclassified as an item under a joint authority construct.

- 4. Should there be a separate category of market rules for which the Board and the Governing Body both have equal authority to review and approve? Currently, rules that fall within the Governing Body's primary authority go first to the Governing Body for review and, if approved, are then placed on the Board's consent agenda for what is typically a more cursory approval process. Are there any types of rules that should instead require full consideration and approval by both the Governing Body and the Board? If so, what types of market rules should fall into this "joint approval" category?**

Yes, as suggested above, joint approval may be a viable option for some decisions. Some issues have comparable impacts on both the Western EIM and the market inside of California, and EDAM could lead to a proliferation of these types of issues. One good example of this type of issue is seams issues between the Western EIM or EDAM and the market inside of California. Having a joint approval category for these types of issues would avoid black and white jurisdictional decisions. These joint decisions would foster consensus building between the EIM Governing Body and Board of Governors, rather than avail the Board of Governors of having a final consent agenda veto on all decisions. Bonneville believes this approach could result in a more equitable governance model.

The creation of the GRC is a good example of the Governing Body and the Board of Governors working jointly and building consensus on an initiative. If the GRC proposes a joint approval classification, approval of joint issues should require an affirmative vote of at least seven or eight out of the 10 Governing Body and Board of Governors members. This would ensure that there is some level of joint consensus on these issues.

B. The Decisional Classification Process

- 1. Are there any changes that should be made to the process through which ISO staff develops and seeks comment from stakeholders on preliminary classification determinations?**

While the ISO staff can and should continue to provide clear initial recommendations for each policy initiative on their own behalf regarding their opinion on preliminary classification determinations, it is important that other input from advisory committees be equally considered to determine the preliminary classification. As discussed above, Bonneville proposes that initiatives arising from advisory committees to the EIM Governing Body should be presumed to be within the EIM Governing Body's primary authority.

2. Are there any changes that should be made to how the Governing Body is kept apprised of these preliminary determinations?

No changes are proposed by Bonneville at this time.

3. Are there any changes that should be made to the decisional classification dispute resolution process set forth in the Guidance Document?

No changes are proposed by Bonneville at this time.

4. What, if any, specific changes should be made to this process to enhance its transparency to stakeholders?

Initial policy classification decisions should be accompanied by a preliminary statement of proposed jurisdiction describing why the specific classification is being proposed.

5. Are there concerns with how the decisional classification rules have been applied to any particular initiative or the process through which a determination was reached?

Bonneville has no concerns at this time.

C. The Process for Changing the Scope of the Delegation

1. Would EDAM require enhancements to the durability of the delegation or are the existing requirements set forth in the Charter for EIM Governance sufficient?

Bonneville views the improved durability and independence of the EIM governance structure as fundamental to the strengthening and expansion of the market into more time horizons and a broader west-wide market footprint. Accordingly, any proposed change to the EIM Governing Body's charter should require the joint approval of both the EIM Governing Body and the ISO Board of Governors.

2. If enhancements are warranted, what form should those enhancements take?

Enhancements should be made through amendments to the EIM Charter.

3. Are any changes warranted even if EDAM is not ultimately established?

Yes, in the interest of the durability of the EIM itself, joint approval should be required for any changes to the EIM Governing Body's charter.

Issue 2: The Process and Criteria for Selecting Governing Body Members

1. Are there any changes that should be made to the nominating committee structure or the process that it follows to identify and evaluate candidates for the Governing Body?

Bonneville believes the current Nominating Committee structure is working well. As the EIM Governing Body roles expand, the Nominating Committee may need to expand as well. All established Committees should have a representative on the Nominating Committee.

2. Are there any changes that should be made to the qualifications and criteria that the Selection Policy directs the executive search firm and the nominating committee to consider when identifying and evaluating candidates for the Governing Body, including more explicit requirements of geographic diversity or diversity of sector experience among the members?

Yes. Candidates with actual market experience, in addition to geographic diversity and diversity of sector should be considered.

3. Are there any changes that should be made to the process for reviewing and approving the slate of nominees that the nominating committee brings forward?

Not at this time.

4. Are there any other changes that should be made to the composition of the Governing Body, such as to the length of terms or the overall size of the body?

Bonneville views the improved durability and independence of the EIM governance structure as fundamental to the stability and expansion of the market. Strengthening the durability of the EIM Governing Body will help to allay regional concerns that the EIM will be directed primarily by California-centric interests. This layer of protection for the EIM and its Governing Body will signal to non-California stakeholders that the ISO Board of Governors and the ISO Management takes seriously the independence of EIM governance from California state policy.

Further, Bonneville believes a search firm should continue to be used when seeking new members of the EIM Governing Body, and consideration should be given to ensure good diversity of sector representation. Beyond that, Bonneville also believes the current process is working well, including the current policy on the length of terms, but this is a process that should be revisited routinely.

Issue 3: Governing Body Meetings and Engagement with Stakeholders

1. Are there any changes that should be made to the Governing Body’s standard meeting processes?

Bonneville does not propose any changes to the Governing Body’s standard meeting processes at this time. Bonneville does strongly encourage the continued use of webinars as a means for stakeholders to participate in these meetings.

2. For example, should any changes be made to the frequency or timing of Governing Body meetings or to the subject matter covered in those meetings?

No changes are proposed by Bonneville at this time.

3. Should any changes be made to the location of Governing Body meetings? Are meetings located outside Folsom helpful?

No changes are proposed by Bonneville at this time, and Bonneville supports continuing meetings located outside the Folsom area.

A. Should there be a Stakeholder Advisory Committee

1. Should a representative stakeholder advisory committee be created? Please explain your reasoning.

Bonneville’s comments for the advisory structure for EIM governance begin with an alternative involving two new committees: (1) a new “Membership Committee” that would consist of each participating Balancing Authority Area and each entity with a signed implementation agreement for EIM participation; and (2) a new “Stakeholder Committee” that would be a representative advisory body from sectors of the electric industry and its constituencies. Entities that are represented on the Membership Committee would not participate in the Stakeholder Committee.

Bonneville believes that the GRC should consider proposing changes to how these, or other bodies created in this process, perform their advisory role. The value of any new body is to be a forum for the discussion of market and administration issues with the ability to communicate directly to the EIM Governing Body.

These two Committees would replace the current Regional Issues Forum. At a minimum, if the Regional Issues Forum continues, it should be formalized and given the authority to develop and propose its own issues. For example, the ISO should consider lifting the restriction that prevents the Regional Issue Forum from addressing issues identified in current stakeholder processes.

The Body of State Regulators would continue in its current function to advocate and communicate directly to the EIM Governing Body. In the comments to follow, Bonneville does not offer any revisions to the current BOSR.

Another alternative would be the creation of three new advisory committees. This would include the Membership Committee and a Stakeholder Committee as described above, and an additional committee to represent the interests of public power and the PMAs. The interests of federal PMAs as well as public power entities and the customers they serve are distinct from the interests of other entities, and arguably are significantly underrepresented in the current EIM governance structure. Federal PMAs and public power entities have a unique role in the west given their geography, customer bases, resource and transmission portfolios, and statutory constructs and obligations. As a result, their interests may diverge from other EIM stakeholders, who primarily answer to investors and state regulators. This difference compels distinct consideration of options for the representation from federal PMAs and public power in the EIM governance structure. The diversity, proliferation, and size of federal PMAs and public power entities throughout the EIM footprint warrant such consideration. Creating a third committee specifically for public power and PMAs would recognize that their interests in the market are unique from the stakeholders that would make up the sectors for the Stakeholder Committee. In any of these advisory committee models the weight given to each committee needs to be equal rather than hierarchical.

The GRC should consider a more formal structure that requires these bodies to develop or, at a minimum, summarize written positions of their members and communicate those positions to the EIM Governing Body for its consideration. In short, Bonneville believes the EIM governance structure should include a direct, meaningful, and effective way of advising the EIM Governing Body, including a robust role for federal PMAs and public power.

- 2. What would the role of the committee be? For example, an ongoing matter of discussion at the RIF is whether the RIF could, as a body, take positions on issues or produce written work products. We would like stakeholder feedback on these and related questions such as:**
- **Should such a committee vote on positions?**
 - **What other mechanisms might a committee use to take positions?**
 - **What role should the committee have in providing input to the Governing Body and Board of Governors?**

Bonneville proposes a new Stakeholder Committee and Membership Committee, and potentially a Public Power/PMA Committee, could replace the current Regional Issues Forum.

Each Committee would discuss issues in the function and administration of the EIM, and would have the ability to take positions on issues and communicate directly to the EIM Governing Body. The committees could also respond to referrals of issues from the EIM Governing Body. Reporting from the committees would be standing agenda items for the meetings of the EIM Governing Body and would be included in deliberations on specific issues before the Governing Body. The committees should be able to contribute written analysis and positions directly to the EIM Governing Body.

Bonneville envisions any advisory committee striving to operate by consensus and, in the absence of consensus, able to present contrasting perspectives. The goal of the advisory committee participation should be to offer broad perspectives from across the electric industry and its related constituencies.

As previously described, Bonneville suggests that perspectives of the Committees, and the Body of State Regulators be communicated to the Governing Body in writing and as provided for by standing agenda items in meetings of the Governing Body. Written communications could be in issue memoranda or more developed reports including alternative recommendations.

Reporting from an advisory committee should be a standing agenda item on EIM Governing Body meetings. An advisory committee can provide reports of its own initiation as well as on questions referred by the EIM Governing Body. On questions that represent a hybrid of authority shared by the EIM Governing Body and the ISO Board of Governors, an advisory committee should have the right to report directly to both.

3. Who would be eligible to serve as members of that body, and how would its membership be established?

A Membership Committee would be composed of representatives designated by name from each of the participants in the EIM with signed Implementation Agreements.

A Stakeholder Committee would be sector-based with representatives selected from each sector and designated by name. In the event that vacancies occur or that a sector representative is not attending meetings, the EIM Governing Body would request designation from the relevant sector of a newly-named representative.

A Public Power/PMA Committee should have adequate representation for public power from each state in the footprint and PMA representation.

4. What range of issues would the committee address?

Bonneville proposes that a Stakeholder and Membership Committee, and potentially a Public Power/PMA Committee should be specifically empowered to address:

- Pending items on EIM Governing Body agenda
- Items that are open in the ISO Stakeholder process (no more prohibition on this)
- Emerging industry issues
- Any market and policy issues

5. What would be the role of the committee in relation to the ISO's current process for obtaining stakeholder input on proposed initiatives, and how would that process change to accommodate a committee?

Advisory committees would report directly to the EIM Governing Body. They would operate in parallel with other stakeholder initiatives run by the ISO and decided by the EIM Governing Body or, for hybrid issues, decided with the ISO Board of Governors.

The EIM Governing Body's deliberations would include the presentation by the committees of their respective reports on the issue under discussion and any recommendations.

The stakeholder processes designed by the EIM Governing Body could include reporting opportunities for the advisory committees and specific consideration of questions for referral by the EIM Governing Body to the committees.

6. Should a stakeholder advisory committee be formed even if EDAM is not ultimately created?

Yes. With the maturity of the EIM and its governance, Bonneville believes it is now appropriate to move beyond the current Regional Issues Forum into advisory committees, as discussed above.

7. If a stakeholder advisory committee were created, should it replace the RIF? If not, what should its relationship with the RIF be?

Bonneville proposes that these new committees replace the Regional Issues Forum with enhanced advisory and reporting capabilities.

B. Possible Funding for the BOSR

1. Is the ISO an appropriate source of funding for the BOSR? What other sources of funding could be available to the BOSR?

Bonneville believes these funding questions deserve broader consideration than simply addressing a possible source of funding for the BOSR. To this end, Bonneville recommends empowering the EIM Governing Body (or the EDAM Governing Body should it come to pass) with an annual funding allotment collected by the ISO from each EIM or EDAM transaction. The EIM Governing Body would then allocate this funding to competing priorities each year. In this manner, the EIM Governing Body should fund an Independent Market Evaluator (IME) to help ensure the fair operation of the market and an equitable allocation of its benefits. Beyond funding an IME, the EIM Governing Body could also choose to commission reports, bring in guest presenters, hire an expert on a limited-scope issue, or fund certain routine operations of the BOSR or any of the other advisory committees proposed herein. This funding source and the EIM Governing Body's role for administering it should be established whether or not EDAM moves forward and the GRC should make such a recommendation.

C. The Role of Public Power and Federal Power Marketing Agencies

1. Should there be formal representation of the governing bodies that oversee public power and the federal power marketing agencies to the Governing Body? If so, what form should such representation take?

As membership in the Western EIM becomes more diverse, including public power entities and federal power marketing administrations, it is reasonable to expect that these entities would have representation similar to the way the BOSR represents the interests of customers served by the investor owned utilities. However, public power entities and the federal power marketers do not have governing bodies that oversee them that are comparable to the State Commissioners that make up the BOSR. Public power entities are overseen by city councils or elected boards, and the responsibilities of these councils or boards varies from state to state and is generally different depending on whether the public power entity is a municipality, public utility district, or coop. While the council or board members generally have a fiduciary duty to the customers of the public utility, similar to State Commissioners, they are solely focused on their own public utility, and do not have a broader state sanctioned mandate of State Public Utilities Commissioners.

The federal power marketing administrations are part of the U.S. Department of Energy. Oversight of the federal power marketing administrations is defined by statutory obligations and directives that are executed through the public decision-making process that provides stakeholders ample opportunity to influence decisions. There is no separate governance oversight entity for the federal power marketing administrations that could represent these interests in a similar fashion as the BOSR.

Rather than attempting to change the BOSR, the GRC could propose the organizational changes discussed above with representatives from the various utilities on the committees acting in an advisory capacity. Setting up a Membership Committee would provide EIM/EDAM participating public power entities and participating federal power marketing administrations a formal seat at the table and the ability to provide direct feedback and advice to the EIM/EDAM Governing Body and the ISO Board of Governors. Because of the structural differences and oversight responsibilities between public power, the federal power marketing administrations, and investor owned utilities, it is essential that there should be a forum for direct input for all participating members.

The GRC should consider the creation of both a Membership Committee which includes PMAs and public power utilities that have joined or are the process of joining, and a Stakeholder Committee to represent public power and PMAs that have not signed Implementation Agreements or are load-serving entities within a Balancing Authority (whether that BA has joined EIM/EDAM or not).

As discussed above, another alternative would be the creation of an advisory committee that only includes PMAs and public power interests, recognizing that these interests are generally aligned and the EIM Governing Body would potentially receive more candid advice from this type of committee.

Issue 4: Other Potential Areas for Governing Body Involvement

1. What role, if any, should the EIM Governing Body have in establishing the annual policy initiative roadmap or with respect to the market monitoring function?

The EIM Governing Body should play an active role in helping develop the annual policy initiative roadmap. The EIM Governing Body should develop recommendations by posing questions to, and receiving input from, the advisory committees reporting to it. The resulting recommendations from the EIM Governing Body would be submitted for ISO Staff's consideration in establishing its annual policy initiative roadmap. ISO Staff should receive and consider these recommendations before proposing its roadmap, rather than receiving recommendations as public comments in response to a proposed roadmap. Given the impact that ISO Staff's roadmap has on the EIM Governing Body's policy development and staffing priorities, early engagement will provide a better opportunity for collaboration and consensus building.

ISO Staff would retain the authority to determine its own policy roadmap, and EIM Entities and stakeholders would be expected to fully participate in those ISO-led stakeholder processes. However, additional policy initiatives should be allowed to originate from the EIM Governing Body or advisory committees, and would fall within the EIM Governing Body's primary authority. Such policy initiatives could be developed in a parallel process, separate from the ISO Staff's annual policy initiative roadmap. The EIM Governing Body would have the autonomy to develop its own meeting agendas to address such initiatives. This proposal helps address Bonneville's concerns with the independence and transparency of the EIM Governing Body's decision-making and agenda-setting roles. The proposal seeks to allow the EIM Governing Body to prioritize issues that are most pressing within the EIM while respecting ISO Staff's discretion over its own time- and resource-allocation decisions reflected in its policy roadmap.

The Department of Market Monitoring and the Market Surveillance Committee should have a formal relationship with both the ISO Board of Governors and the EIM Governing Body. They should be expected to provide the same degree of oversight and analysis for the EIM as for the full ISO market. The need for additional EIM-specific expertise is discussed below.

2. Should additional resources be available to the Governing Body to assess market design and performance issues, such as a new market expert that is separate from DMM or MSC? Should any new resources be permanent or as-needed? How should such resources be funded?

In light of the EIM's expansion, the EIM Governing Body does need additional resources to adequately assess market design and performance issues. The EIM Governing Body also needs the flexibility to appropriately address such issues as they emerge. Bonneville proposes the EIM Governing Body be given a budget to cover at least a couple dedicated staff. Acting within that budget, the EIM Governing Body could prioritize which areas of subject matter expertise are most important and decide how best to receive such expertise. For example, the EIM Governing Body would have the discretion to use its budget to

commission reports, bring in guest presenters, hire an expert on a limited-scope issue, hire an Independent Market Evaluator or create a more permanent position.

3. Do the answers to these questions depend in any way on whether EDAM is implemented, and if so how?

Bonneville's comments regarding areas of EIM Governing Body involvement reflect the current state of the EIM, and do not depend on whether EDAM is implemented. Bonneville's view of the EIM Governing Body's proper role, and attendant resources, reflect the EIM's maturation and increased participation. EDAM would only bolster the case for additional roles and resources. For example, if EDAM were implemented, the complexity and potential for different rules between EDAM and the full ISO market may warrant creating separate, EDAM-specific entities, such as an Independent Market Evaluator with responsibilities similar to the market oversight and policy development analysis provided to the ISO Board of Governors by the DMM and MSC.

Issue 5: Guiding Principles

1. Should the GRC have guiding principles, beyond fulfilling its charter from the Governing Body and the Board?

Yes. While the primary role of the GRC is to fulfill its charter, Bonneville suggests the GRC develop principles for guidance on addressing matters that arise outside of the defined charter. Rather than dismiss such a topic outright, it may be worthy of some discussion and there should be a principle for how to advance such a topic for further consideration by an appropriate alternate venue.

2. If so, should the guiding principles from the Transitional Committee, as stated above, be supplemented or modified?

The guiding principles from the Transitional Committee remain important, relevant guidance for the GRC as the proposal is developed for a revised EIM governance structure.

Issue 6: Other Potential Topics for Consideration

1. The GRC should establish an automatic re-opener for the governance structure either five years from the time the proposal is complete or two years after EDAM begins operations. This would be similar to the five year re-opener for the EIM that set the GRC process in motion. The rationale for the re-opener is based on the quickly changing energy industry and the recognition that EDAM will foster a significant amount of work.