

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

Comment Areas	Stakeholder Comments	GRC Response
Issue 1: Delegation of Authority for Market Rules to the EIM GB and the Decisional Classification Process	AWEA, BOSR, BPA, Chelan, CMUA, CPUC, EIM, NVE, PAO, PGE, PGP, PIO, PPC/NRU, SCE, Six Cities	
<i>Scope of Delegation to the Governing Body</i>	AWEA suggests that the GRC consider moving away from a primary authority definition based on the 'driver' for a change, and instead be focused on the market function it impacts. AWEA supports consideration of a category of market rules for which the governing body and board of governors would have equal authority to review and approve.	See Straw Proposal at Section III.Issue 1.E
	BOSR supports shared authority between the GB and Board on proposed market changes that affect the EIM BAAs.	See Straw Proposal at Section III.Issue 1.E
	BPA recommends in a non-EDAM scenario, 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 EIM BAAs. In an EDAM scenario, 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 EDAM BAAs. 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.	See Straw Proposal at Section III.Issue 1.G
	CMUA supports a bright-line rule to determine the scope of any delegated or jointly exercised authority.	See Straw Proposal at Section III.Issue 1.G

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	<p>CPUC Energy Division suggests that in a non-EDAM scenario, there is no need for changes to the scope. In an EDAM scenario, the current delegated frameworks could be expanded to incorporate a collaborative approach for a subset of day ahead and real time market rules. Staff supports the development of more definitive criteria to classify market rules that would be considered under primary authority.</p>	<p>See Straw Proposal at Section III.Issue 1.G</p>
	<p>PAO recommends that the GB have advisory authority for EDAM, since the market will expand to facilitate voluntary participation of the EIM entities in the day-ahead market which is overseen by the Board</p>	<p>See Straw Proposal at Section III.Issue 1.D</p>
	<p>EIM Entities contemplate a new construct in which the approval authority for tariff rule changes falls into three buckets (1) GB primary oversight (2) Board Sole Oversight and (3) Hybrid Oversight.</p>	<p>See Straw Proposal at Section III.Issue 1.G</p>
	<p>NVE suggests the GB should be delegated primary authority for initiatives related to the RTM, with the limited exceptions of issues that apply uniquely to CAISO BAA. If EDAM goes forward, the primary authority of the GB should be expanded to encompass the day-ahead market as well while oversight of markets should be under the primary authority of the GB, all other tariff rules would continue to remain with the Board's primary authority. A limited subset of issues that affect both the real-time market and day-ahead markets and other programs could be considered hybrid, requiring formal approval by both the GB and Board.</p>	<p>See Straw Proposal at Section III.Issue 1.G</p>

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	<p>PG&E supports a transition to a bright line test in an EDAM-scenario. PG&E also supports an extension of the delegated authority model in which the Board would delegate its decision-making for certain initiatives to a joint approval committee, composed of both the Board and GB, meeting in joint session. Once this joint committee arrives at a decision, that decision would be referred to the Board for approval on its consent agenda.</p>	<p>See Straw Proposal at Section III.Issue 1.D</p>
	<p>PGP comments that in a non-EDAM scenario, the GB have primary authority over generally applicable rules of the RTM, regardless of driver of the change, unless it applies uniquely to the CAISO BAA. In an EDAM scenario, GB should be given primary authority over DA and RTM unless the market change applies uniquely to the CAISO BAA. Any changes to the GB scope of delegated authority must be approved by a majority vote of the Board and the GB.</p>	<p>Authority see Straw Proposal at Section III.Issue 1.D Durability see Straw Proposal at Section III.Issue 1.G</p>
	<p>PIO suggests a delineation of governance between interstate markets and services vs CA-only markets and services or to create a dual board governance model where the Board and GB have shared roles in governing the various markets. PIO also suggests the GRC consider eliminating the requirement that the Board provide final approval of decisions that fall squarely within the authority of the GB.</p>	<p>Authority see Straw Proposal at Section III.Issue 1.D Board authority see Straw Proposal at Section III.Issue 1.G</p>
	<p>PPC/NRU comment that in an EDAM scenario, the GB be given authority over all day-ahead market and real-time market design and primary authority when rules apply broadly across the market. When day ahead market issues impact only CAISO BAA, the Board should have authority over those rule changes.</p>	<p>See Straw Proposal at Section III.Issue 1.D</p>

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	SCE offers support for the potential of joint-decision making by the Board and the GB.	See Straw Proposal at Section III.Issue 1.E
	Six Cities support a structure for EDAM governance that would provide joint oversight responsibility and authority to the GB and Board for market rules and policies that would affect the RTM processes or DAM processes. Six Cities do not support granting primary authority over EDAM rules to the GB while limiting the role of the Board to review through a consent agenda process.	See Straw Proposal at Section III.Issue.1.G
<i>Decisional Classification Process and Dispute Resolution</i>	AWEA suggests preliminary decisional classifications could be reviewed with the GB and Board at the beginning (or at least early stages) of an initiative.	See Straw Proposal at Section III.Issue 4.1.D
	BPA comments that ISO staff should continue to provide clear initial recommendations for each policy initiative. Other input from advisory committees be equally considered to determine the preliminary classification and initiatives arising from committees should be presumed to be within the GBs primary authority.	See Straw Proposal at Section III.Issue 4.1.D
	PGP suggests revisions to the dispute resolution process that give equal deference to the Board and GB be considered. In an EDAM scenario, PGP suggests a process that allows two attempts for reconsideration of proposed tariff changes that are rejected by the Board from the consent agenda. If no reconciliation, the Board could approve two alternative tariff filings, reflecting the preferred proposals of the Board and GB, to be filed with FERC.	See Straw Proposal at Section III.Issue 1.F.i

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	PPC/NRU proposes that a third party dispute resolution process be established to resolve cases where the GB and Board disagree on adopting CAISO proposals.	See Straw Proposal at Section III.Issue 1.F.i
	SCE comments the current but-for principles as applied to the decisional classification provide insufficient guidance for expansion of the day-ahead market to the EIM footprint. SCE concurs that continued stakeholder input on the preliminary determination of all decisional classifications be retained as currently practiced. SCE supports the Boards retaining ultimate dispute resolution authority on the matter.	See Straw Proposal at Section III.Issue 4.1.D
<i>Process for Changing the Scope of Delegation</i>	BPA comments that any proposed change to the EIM GB’s charter should require the joint approval of both the GB and the Board and enhancements should be made through amendments to the EIM charter.	See Straw Proposal at Section III.Issue 1.G
	Chelan suggests that an EDAM governance structure should meet the FERC independence threshold. The Board will need to delegate sufficient authority to and EDAM GB to independently craft and sustain market rules. The Board must be precluded from unilaterally shrinking its purview or nullifying the Charter for EIM Governance.	See Straw Proposal at Section III.Issue 1.G The GRC believes that its proposal is consistent with FERC independence requirements. The GRC proposal was informed by the legal and practical limitations on how the degree to which the Board may delegate its authority discussed in Appendix A.
	CMUA supports durability of governance provisions, such as supermajorities or other mechanisms that would require enhanced consensus to approve governance changes. At this juncture, CMUA would not, for example, support embedding governance provisions in the Tariff.	See Straw Proposal at Section III.Issue 1.G

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	PAO recommends the process for changing the scope of authority delegated to the EIM GB should remain unchanged with or without the implementation of the EDAM.	See Straw Proposal at Section III.Issue 1.G
	EIM Entities comment that in an EDAM scenario the GB's durability should be addressed in the GRC process to assure market participants have a protection against defunding or disbandment of the GB.	See Straw Proposal at Section III.Issue 1.G
	PGP recommends that the GB bylaws include a provision that the GB cannot be dissolved or defunded without a majority vote of both the GB and Board.	See Straw Proposal at Section III.Issue 1.G
	PPC/NRU provides a majority vote of both the GB and Board should be required to make changes to the delegation of authority to the GB. A majority vote from both the Board and GB should be required to defund, and essentially dissolve, the GB.	See Straw Proposal at Section III.Issue 1.G
Issue 2: Process and criteria for selecting governing body members	AWEA, BOSR, BPA, CMUA, CPUC, PAO, PGE, PGP, PIO, SCE	
	AWEA comments that broader voting participation in the NC should be explored, that the GB represents diversity from a sector standpoint, and supports consideration of the expansion of the size of the GB.	Nominating Committee see Straw Proposal at Section III.Issue 2.D.i The GRC believes that the GB has operated effectively at its current size and is concerned that increasing its size would increase cost, add complexity, and could reduce the cohesive operation of the body.

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	BOSR supports a change in the voting status for the representative of public interest and consumer advocate groups on the NC.	See Straw Proposal at Section III.Issue 2.D.i
	BPA comments that the current NC structure is working well, but as the GB roles expand, the NC may need to expand as well. In addition, candidates with actual market experience, in addition to geographic diversity and diversity of sector should be considered.	See Straw Proposal at Section III.Issue 2.D.i and ii
	CMUA supports an increase in the size of the GB to at least seven members.	The GRC believes that the GB has operated effectively at its current size and is concerned that increasing its size would increase cost, add complexity, and could reduce the cohesive operation of the body.
	CPUC Energy Division comments that the GRC consider increasing the size of the NC to ensure that market participants can have a role in selecting candidates that complement existing members of the GB and that the public interest and consumer group should have a voting role in this process.	See Straw Proposal at Voting Section III.Issue 2.D.i The GRC believes that the GB has operated effectively at its current size and is concerned that increasing its size would increase cost, add complexity, and could reduce the cohesive operation of the body.
	PG&E comments that the number of members of the GB could be enlarged to accommodate the larger geographic footprint and to achieve a broad stakeholder representation.	Selection criteria see Straw Proposal at Section III.Issue 2.D.ii The committee finds that the current number of governing body members is sufficient.

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	PIO recommends the public interested and consumer advocate groups sector be afforded voting rights on the NC.	See Straw Proposal at Section III.Issue 2.D.i
	SCE prefers GB candidates who are familiar and have had work experience with the western region. SCE supports expansion of the candidate pool to include candidates with deep technical experience and less leadership experience. SCE offers that commencement of the search process by the NC sooner rather than at the end of the expired term should be considered.	See Straw Proposal at Section III.Issue 2.D.ii and iii
Issue 3: Governing Body meetings and engagement with stakeholders	AWEA, BOSR, BPA, CMUA, CPUC, PAO, EIM Entities, NVE, PG&E, PGP, PIO, PPC/NRU, Public Power, SCE, Six Cities	
<i>Should there be a stakeholder advisory committee?</i>	AWEA supports consideration of a more formal SAC that would ensure stakeholders have an expanded role of communicating their views on proposals and arising market issues to the GB.	See Straw Proposal at Section III.Issue 3.D.ii
	BOSR considers the establishment of an advisory committee that would provide an avenue for market stakeholders to effectively engage with the Board and GB.	See Straw Proposal at Section III.Issue 3.D.ii
	BPA suggests two new committees: a membership committee that would include each BAA and entity with a signed implementation agreement, and a stakeholder committee that would be a representative advisory body from sectors of the electric industry and its constituencies. These two committees would replace the current RIF. At a minimum, if the RIF continues, it should be formalized and given the authority to develop and propose its own issues. Alternatively, BPA suggests a proposal with 3 new committees. Membership committee, stakeholder committee and another committee to represent the interests of public power and PMAs.	See Straw Proposal at Section III.Issue 3.D.ii and iii

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	<p>CMUA generally supports the creation of a stakeholder advisory committee made up of senior and knowledgeable representatives from various sectors that will discuss issues, provide a forum for education, produce position papers or other documents, and be a resource for decision makers when complex issues come before them. CMUA believes this committee should replace the RIF.</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii</p>
	<p>PAO does not recommend a separate stakeholder advisory committee for EDAM.</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii</p>
	<p>EIM Entities recommend a strong MAC, this committee would consist each of the EDAM entities and the PTOs. This committee would not have decisional authority, and could not veto or modify CAISO staff recommendations, but would be a formal advisory channel to provide opinion and counsel directly to the GB.</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii</p>
	<p>PG&E comments that they are not necessarily opposed to the creation of a SAC in an EDAM scenario. PG&E recommends that the GRC defer any decision on this matter until later in the governance design process, perhaps even after some period of EDAM operation.</p>	<p>See Straw Proposal at Section III.Issue 1.D and 3.D.ii</p>
	<p>PGP recommends elevating the RIF to a MAC, modifying the sectors to better represent the current market sectors, allowing the body to address stakeholder initiatives, eliminating restriction on GB attendance at meetings, and allowing the body to offer opinions or recommendations on active initiatives in advance of GB decisions.</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii</p>
	<p>PIO believes the current model is working effectively and that a SAC is not needed.</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii</p>

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	<p>PPC/NRU recommends that the RIF be transitioned into a SAC that could develop consensus opinion and directly represent those positions on current initiatives to the GB. The body could function like the RIF, with the exception that it would discuss proposals that are currently under consideration. No voting structure would be needed, but members could report out on discussions from that forum to the GB.</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii</p>
	<p>Public Power supports the formation of a SAC that would consist of a diverse array of market participants and end-use customers. The SAC would not have decisional authority but would be a formal advisory channel to provide opinions and recommendations to the Board and GB on behalf of market participants in a public form, including policy issues. Public Power does not recommend a specific voting or other mechanism for reaching agreements, but recommends the GRC examine other RTO/ISO standing committee policies.</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii and iii</p>
	<p>SCE's comments offer no support for conversion of the RIF into a stakeholder advisory committee with voting rights. If the RIF seeks an advisory role, that role should be limited to the GB without accreditation of any voting rights</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii</p>
	<p>Six Cities believe that the RIF has provided a constructive and effective venue for identification and discussion of market issues and do not see a need for more formal or representative stakeholder advisory committee. They would not object to the creation of a stakeholder advisory committee, any such group should not have any special status in stakeholder initiatives or similar processes conducted by the GB</p>	<p>See Straw Proposal at Section III.Issue 3.D.ii</p>

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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<i>Possible funding for the BOSR</i>	AWEA comments that BOSR and its participants could benefit from additional resources, including funding to support their efforts and it makes sense for the GRC to make a formal recommendation regarding funding for the BOSR.	See Straw Proposal at Section III.Issue 4.III.D
	BOSR comments that they concluded that WIEB is best situated to provide this support in a competent and cost-effective manner and it is their intention to have its funding provided by retail electricity customers of the EIM entities, recovered via the CAISO EIM tariff. BOSR requests this proposal be included in the GRC's scope of work.	See Straw Proposal at Section III.Issue 4.III.D
	BPA recommends empowering the GB with an annual funding allotment collected by the ISO from each EIM/EDAM transaction to commission reports, bring guest presenters, high experts or fund certain routine operation of the BOSR or any other advisory committees proposed.	See Straw Proposal at Section III.Issue 4.III.D
	CMUA finds that supporting the BOSR through a CAISO administered charge is concerning and the precedent of funding subsets of interested parties, even if they are state regulators, through a market charge, sets a troubling precedent.	See Straw Proposal at Section III.Issue 4.III.D
	CPUC Energy Division supports additional resources for the BOSR to effectively participate in stakeholder processes and provide input to the GB and that funding would be appropriately collected through the EIM tariff.	See Straw Proposal at Section III.Issue 4.III.D
	PAO does not support the proposal to provide funding from the CAISO to educate the BOSR on technical issues.	See Straw Proposal at Section III.Issue 4.III.D

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	EIM entities support letting the GRC address this issue and make recommendations where they feel appropriate.	See Straw Proposal at Section III.Issue 4.III.D
	NVE comments that the members of the BOSR are best suited to determine the scope and type of resources that would be most useful and efficient to assist them and if the CAISO is the agent for the collection or disbursement of the revenues, it doesn't mean that this aspect of the grid management charge must be assessed on all CAISO market participants. It is certainly possible, as with other CAISO charges, that it only be assessed to EIM entities with representatives on the BOSR.	See Straw Proposal at Section III.Issue 4.III.D
	PG&E does not believe the CAISO should fund the BOSR.	See Straw Proposal at Section III.Issue 4.III.D
	PGP comments that they prefer no changes to the support provided to BOSR. Further, PGP believes this is out of scope for the GRC.	See Straw Proposal at Section III.Issue 4.III.D
	PIO supports consideration by the GRC of this type of funding mechanism to provide technical support for the BOSR regardless of whether EDAM is fully implemented.	See Straw Proposal at Section III.Issue 4.III.D
	PPC/NRU comments that the CAISO is not an appropriate source of funding for the BOSR.	See Straw Proposal at Section III.Issue 4.III.D
	SCE is unsupportive of funding a technical expert to support such participation from the BOSR. SCE wishes clarification on whether the grid management charge levied by the CAISO currently covers any financial assistant to the BOSR.	See Straw Proposal at Section III.Issue 4.III.D

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	Six Cities oppose any additional funding for BOSR activities through the CAISO, and imposing such a funding obligation on all market participants through the CAISO is not appropriate.	See Straw Proposal at Section III.Issue 4.III.D
<i>Role of public power and federal power marketing agencies</i>	AWEA comments that the GB is intended to be independent of various market participant influences and believes it is inappropriate for a particular sector of the market (public power) to have special representation to the GB. Additionally, the BOSR is a unique body in that it is comprised of truly independent individuals whose job it is to regulate utilities.	See Straw Proposal at Section III.Issue 3.D.iii
	BOSR supports consideration of a proposal to include formal representation for the governing bodies that oversee public power and federal public marketing agencies to the GB.	See Straw Proposal at Section III.Issue 3.D.iii
	CMUA does not object to the GRC considering the concept of a separate BOSR-like structure for public power including power marketing administrations.	See Straw Proposal at Section III.Issue 3.D.iii
	EIM entities comment that the BOSR as currently constituted, does not provide adequate representation for these entities that are not subject to state commission authorities. An EDAM BOSR should have authority over market rules that affect public power entities.	See Straw Proposal at Section III.Issue 3.D.iii
	PG&E states they are agnostic as to the form of appropriate representation for public power and federal power PMAs in the EDAM, but support the principle of equitable participation of all EDAM stakeholders in the governance structure. If non-state-jurisdictional entities wish to create an independent institution to coordinate outreach with local regulators/federal agencies, this body should be accorded the same institutional courtesy as	See Straw Proposal at Section III.Issue 3.D.iii

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	the BOSR. PG&E would oppose any explicit CAISO funding mechanism to support these independent bodies.	
	PGP recommends that a public power body similar to the BOSR is created that is designed to represent the regulatory concerns and customer interests of public power.	See Straw Proposal at Section III.Issue 3.D.iii
	PPC/NRU suggest public power should be given the opportunity to provide direct input to the EDAM GB. The EDAM governance model should establish such a committee, similar to the BOSR, made up one representative of public power from each state with market participants.	See Straw Proposal at Section III.Issue 3.D.iii
	Public Power comments that they would ideally participate along with state regulators on BOSR. As an alternative, they advocate strongly that the GRC should develop options for alternative and analogous structures for these groups and would serve an advisory function, similar to role of the BOSR.	See Straw Proposal at Section III.Issue 3.D.iii
	SCE supports the idea of a representative for public power and federal marketing entities within a reformed BOSR due to the difference in regulatory authority for such entities. SCE is unable to support the formation of another body for these entities. Further, SCE is not amenable to funding an additional representative and does not support the cost of another committee.	See Straw Proposal at Section III.Issue 3.D.iii
Issue 4: other potential areas for governing body involvement	AWEA, BOSR, BPA, Chelan, CPUC, EIM Entities, NVE, PGE, PGP, PIO, PPC/NRU, SCE	

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	<p>AWEA comments the GB should play a role in prioritizing and establishing the annual policy initiative roadmap to ensure that initiatives it feels are important are appropriately prioritized and scheduled by the ISO. AWEA also believes it will be important to have a new market expert available to advise and assist the GB.</p>	<p>See Straw Proposal at Section III.Issue 4.I.D and 4.II.C</p>
	<p>BOSR supports making additional resources available to the EIM GB to provide technical advice on market design and performance issues.</p>	<p>See Straw Proposal at Section III.Issue 4.II.C</p>
	<p>BPA recommends the GB play an active role in helping develop the annual policy initiative roadmap and develop recommendations by posing questions to, and receiving input from, any advisory committees reporting to it. In addition the DMM and MSC should have a formal relationship with both the Board and the GB. The GB should be given a budget to cover at least a couple dedicated staff to commission reports, bring guest presenters, higher an expert on a limited-scope issue, higher an independent market evaluator or create a more permanent position.</p>	<p>See Straw Proposal at Section III.Issue 4.I.D and 4.II.C</p>
	<p>Chelan comments the GB will need adequate access to financial and human resources, and independent market expertise, to be sufficiently durable and effective.</p>	<p>See Straw Proposal at Section III.Issue 4.II.C</p>
	<p>CPUC supports additional resources for the DMM and discussion on a role for the GB on the DMM oversight committee. Staff is concerned that establishing a distinct market expert entity would be inefficient by duplicating existing functions and resources without adding significant value.</p>	<p>See Straw Proposal at Section III.Issue 4.II.C</p>

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	<p>EIM Entities comment the GB and Board should have similar authority with respect to approval of the Policy initiatives roadmap and any necessary updates or modifications regarding initiatives affecting the EIM and EDAM. GB should review, approve and monitor the process of activities on the roadmap. Also comment that For at least a 5-year implementation period, the EDAM GB should have the further support of an independent market expert to provide additional perspective on the technical issues that the GB will have to review. The GB could evaluate the continuing need for the independent expert.</p>	<p>See Straw Proposal at Section III.Issue 4.I.D and 4.II.C</p>
	<p>NVE recommends CAISO should submit the policy initiatives roadmap for review and formal approval by the GB and Board. The GB should review, approve and monitor the progress of activities on the roadmap related to the markets they oversee. The functional reporting responsibility for DMM and the MSC for market monitoring activities should be transferred to the GB as an independent committee of the Board.</p>	<p>See Straw Proposal at Section III.Issue 4.I.D and 4.II.C</p>
	<p>PG&E supports the greater involvement of the GB in the policy initiative roadmap, however no formal changes are needed to accommodate this role, which exists through informal consultation today. PG&E supports retention of both the DMM and MSC, in their current form, and believes their respective roles can encompass market monitoring and expertise related to both the day-ahead and real-time markets under EIM.</p>	<p>See Straw Proposal at Section III.Issue 4.I.D and 4.II.C</p>
	<p>PGP supports having the GB and Board approve the policy initiative roadmap and any necessary updates or modifications. Supports an independent market expert to serve as a resource and report to the GB. Further, it is recommended that the</p>	<p>See Straw Proposal at Section III.Issue 4.I.D and 4.II.C</p>

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	Independent market expert be funded through a Grid management charge.	
	PIO comments support the acquisition of an independent market expert for purposes of EDAM on a contract basis.	See Straw Proposal at Section III.Issue 4.II.C
	PPC/NRU comments that the GB and Board should have access to an independent market expert to provide analysis on proposals and conduct regular assessments on the performance of the EDAM market. The cost of this market expert should be funded by participants through a grid management charge. They recommend the Board and GB approve the roadmap and provide guidance to the CAISO staff on within-year changes during quarterly updates.	See Straw Proposal at Section III.Issue 4.I.D and 4.II.C
	SCE's preference is for members of the EIM GB to enjoy similar consultative privileges as the members of the Board in relation to the DMM and MSC. SCE is unable to support the granting of reporting authority whereby the DMM reports to the GB as it does to the Board currently. SCE is supportive of the GBs participation in the selection process of members of the MSC though SCE cannot support the suggestion for a technical expert identified by the GB to fulfill an independent role external to the MSC. SCE remains open to a role for the GB in the development and approval of the annual policy initiative roadmap, provided that this role expires if the EIM or EDAM do not exist.	See Straw Proposal at Section III.Issue 4.I.D and 4.II.C
Issue 5: guiding principles	AWEA, BOSR, BPA, CMUA, PAO, EIM Entities, PGP, PIO, PPC/NRU	
	AWEA suggests the addition of a number of guiding principles.	See Straw Proposal Section III.Issue 5

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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	BOSR recommends the GRC supplement the guiding principles to add statements covering the transparency and inclusiveness of its decision process. The GRC should articulate clear criteria for its use of closed executive sessions and that the GRC include provisions for transparency and inclusiveness in any proposal that is developed.	See Straw Proposal Section II.B
	BPA recommends the GRC develop principles for guidance on addressing matters that arise outside of the GRC's defined charter. With respect to the guiding principles developed by the Transitional Committee, BPA believes these remain important, relevant guidance for the GRC as it develops its proposal.	See Straw Proposal Sections II.B and III.Issue 5
	CMUA suggests if the GRC chooses to develop guiding principles, it is likely that a fresh look is needed as the EDAM market differs significantly from the EIM.	See Straw Proposal Section III.Issue 5
	PAO recommends the continued use of the five key criteria by the GB.	See Straw Proposal Section III.Issue 5
	EIM Entities recommend the GRC follow as closely as possible the principles outlined in the scoping paper and generally support the guiding principles.	See Straw Proposal Section II.B
	PGP Supports guiding principles and have some recommendations on the language.	See Straw Proposal at Section II.B
	PIO supports the use of guiding principles to assist the GRC in its development of a final governance proposal to accommodate both the EIM and EDAM.	See Straw Proposal at Section II.B
	PPC/NRU comments the guiding principles should be retained for EDAM.	See Straw Proposal Section III.Issue 5

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

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Issue 6: Other topics for consideration	AWEA, BPA, CPUC, PAO, PGE, PGP, PPC/NRU, Six Cities	
	AWEA comments that the GRC is likely to complete its work prior to EDAM market design being complete, so they should complete their recommendation and then pause until EDAM market design becomes more certain.	See Straw Proposal at Section III.Issue 6
	BPA recommends there be an automatic re-opener for the governance structure either 5 years from the time the proposal is complete or two years after EDAM begins operations.	See Straw Proposal at Section III.Issue 6
	CPUC requests the GRC incorporate an additional step into its timeline for stakeholders to review any governance proposals for the EDAM that are developed prior to the completion of EDAM.	See Straw Proposal at Section III.Issue 6
	PAO recommends that the CAISO should ensure resource commitments from EIM entities because the participation in EIM and EDAM markets is voluntary. In addition, any changes to the governance and operations rules should not undermine CA environmental regulations.	The GRC believes this is not in scope for the GRC. The EDAM market design initiative is expected to examine resource sufficiency evaluations required for participation by EIM entities in the day-ahead market
	PG&E views the issue of the governing body’s role in deciding spending priorities to be a governance issue within the scope of the GRC’s purview. Issues relating to how rates are designed of the EIM/EDAM fees are assessed are outside the GRC’s purview and will be addressed in the EDAM stakeholder initiative.	The GRC agrees that the role of the governing body in deciding spending priorities is a governance topic within the GRC’s purview. However, the straw proposal does not propose any changes in this area.

Stakeholder Comments and EIM Governance Review Committee Responses to the February 5, 2020 Scoping Paper

Comment Areas	Stakeholder Comments	GRC Response
	<p>PGP comments that language in the mission and criteria of the GB regarding the voluntary nature of the market without exit fees should be enhanced to specify the 180-day window for participants to withdraw and clearly state no fees are to be assessed.</p>	<p>See Straw Proposal Section III.Issue 5</p>
	<p>PPC/NRU comments that language that states the EIM GB shall 'allow EIM entities to withdraw prior to action that would cause an exit fee' should be maintained and strengthened, and the GRC should include another opportunity for stakeholder to review governance, both for the EIM and for EDAM, in the next five years.</p>	<p>Exit requirements see Straw Proposal Section III.Issue 5</p> <p>Governance re-evaluation see Straw Proposal Section III.Issue 6</p>
	<p>Six Cities suggest any expansion of the authority of the GB should trigger a review of the GMC applicable to EDAM transactions.</p>	<p>The committee does not believe this topic is in scope for the GRC. The EDAM initiative is expected to examine and determine administrative fee for participation by EIM entities in the day-ahead market</p>