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EIM Governing Body Guidance Document
Public Generating Pool Comments
October 18th, 2016

The Public Generating Pool (PGP) appreciates the opportunity to comment on the EIM Governing Body Guidance Document published on October 4th, 2016. PGP is comprised of ten consumer-owned electric utilities located in Washington and Oregon. Collectively, PGP member utilities serve approximately two million people with a 6,000 MW utility-owned asset base that is 86% hydro and 96% carbon-free. Three of the PGP member utilities own and operate their own Balancing Authority Areas.

PGP is pleased with the appointment of an independent EIM Governing Body selected by regional stakeholders that has delegated authority over the market rules of the EIM and commends the ISO for its efforts in bringing this about. PGP supports the EIM Governing Body Guidance Document that explains the delegation of authority and provides additional detail about the process that ISO Management should follow with policy initiatives during both the stakeholder process and the Board approval phase. Specifically, PGP appreciates the emphasis on providing the EIM Governing Body the full benefit of stakeholder input.

PGP believes the Regional Issues Forum and the Body of State Regulators are important in ensuring the EIM Governing Body is able to perform its functions effectively and that there should be a way for these two bodies to provide direct input to the EIM Governing Body on ISO policy initiatives. PGP believes this can take place, along with ISO Management's explanation of the issue and proposed resolution, as matters are presented to the EIM Governing Body for decision or in its advisory role. Direct input from the Regional Issues Forum and the Body of State Regulators will ensure that the EIM Governing Body hears from a broad set of stakeholders on key policy changes that impact them.

Once again, PGP appreciates and supports the continued progress being made on the details surrounding an independent governance structure for the EIM and looks forward to engaging further, in particular as the role of the Body of State Regulators and Regional Issues Forum and the process of engagement with the EIM Governing Body is defined more fully.

Public Generating Pool

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