

Comments of Seattle City Light on EIM Governance Review

Submitted by	Company	Date Submitted
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Seattle City Light (Seattle) is the tenth largest consumer owned electric utility in the nation, providing electrical service to more than 450,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. Seattle owns and operates hydroelectric resources with approximately 2,000 MW of flexible, fast-ramping capacity. We regularly transact in the wholesale energy and transmission markets. Seattle executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Western Energy Imbalance Market (EIM) in April 2020.

Summary of Comments

Thank you for the opportunity to comment on CAISO's *EIM Governance Review Issue Paper & Straw Proposal*. Seattle City Light supports the straw proposal as it relates to the immediate issue of decisional classification and the proposal to delegate primary authority to the EIM Governing Body over certain tariff amendments. Seattle further supports the comments developed and submitted by the EIM Entities as well as the comments developed and submitted by the Public EIM Entities, both in which we are active members and participants. Seattle also supports PPCs comments but does not go so far as to recommend that the broader governance review should take place now as opposed to after more details and decisions are made regarding the Enhanced Day-Ahead Market's (EDAM) feasibility.

Detailed Comments

Decisional Classifications

Seattle City Light is a member of a number of commenting groups and coalitions. As with any group comments, threading the needle of perfect alignment amongst all commenting groups is difficult. That being said, Seattle supports the EIM Entities, the EIM POU group, and PPC's comments in support of the specific issue of decisional classification changes contemplated in the current iteration of the EIM Governance Review Issue Paper & Straw Proposal. Additionally, Seattle believes the decisional classification rules should further be refined to

provide primary authority to the EIM Governing Body over all real-time market activities as well as primary authority to the EIM Governing Body or EDAM.

Public Power Representation

Seattle City Light also supports the desire of many stakeholders to remedy the lack of representation by public power utilities in existing structures. Within the current structure of the EIM Governing Body Seattle believes the BOSR could be augmented to allow for public power representation and, in the event EDAM moves forward, there should be a larger and more equitable role for public power and the federal power marketing agencies (PMAs) in the current and future governance structure.

Timing

As stated above, Seattle is supportive of the Straw Proposal changes as they relate to decisional classification and urge the CAISO to move quickly on this effort. However, Seattle believes that substantive changes to overall governance structure should be on a timing track that is more closely aligned with the future EDAM stakeholder process. As discussed in the EIM entities and EIM POU comments, Seattle City Light supports a stakeholder-based working group being formed and the process of nominating, selecting, and convening this group should start immediately.

Moving forward with a broader stakeholder process on the EIM Governing Body's structure could be duplicative or misdirected by more significant changes to the market if EDAM moves forward.

Thank you for the opportunity to comment and if you have any questions please contact Josh Walter at josh.walter@seattle.gov (206)684-3654.