

## Stakeholder Comments

### Energy Imbalance Market

Submitted by	Company	Date Submitted
Gary Lawson <a href="mailto:Gary.Lawson@smud.org">Gary.Lawson@smud.org</a> (916) 732-5802	Sacramento Municipal Utility District (SMUD)	October 8, 2013, to <a href="mailto:EIM@caiso.com">EIM@caiso.com</a>

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide its comments to the California Independent System Operator Corporation's (CAISO) September 23, 2013 "Energy Imbalance Market (EIM) Draft Final Proposal" (Draft Final Proposal) and its September 30, 2013 stakeholder meeting in Folsom, which SMUD attended.

#### **EIM Transmission Service Provider Definition**

The CAISO defines an EIM Transmission Service Provider as the following: "a transmission owner or customer (may be a 3<sup>rd</sup> party separate from the EIM Entity) that controls transmission in the EIM Entity balancing authority area. Such a provider can voluntarily inform the EIM entity that it is making its transmission available for EIM use." (Draft Final Proposal at 10)

It is unclear from this definition whether a transmission owner or customer that is located within the geographic area of another EIM Entity, but is not a part of that EIM Entity's balancing authority area, may still make its transmission available for EIM use. SMUD does not believe this is the intent and therefore requests the CAISO clarify that the transmission owner and customer may only make its transmission available for EIM use if its balancing authority is an EIM Entity.

#### **Transmission Service Charge Development Timeline**

Throughout the EIM stakeholder initiative, the CAISO has conveyed there would be no transmission charge between the CAISO and initial EIM entities for the *first year* of implementation. However, at the September 30<sup>th</sup> stakeholder meeting, the CAISO presented a *two year* (not one year) timeline for development of a transmission charge. While SMUD recognizes that establishment of a charge at EIM start-up in October 2014 (as we have continuously backed) will not go forward, SMUD does not support an additional one year delay in establishment of a transmission service charge as is now being proposed by the CAISO. Accordingly, SMUD strongly encourages the CAISO stick with its original proposal to develop a transmission service charge that applies after the first year of implementation, beginning October/November 2015.

## **Business Practice Manual**

SMUD encourages the CAISO create a separate BPM for the EIM. This will ensure information relevant to the EIM is readily accessible by all entities participating in the EIM. Certain entities may have limited or no prior market experience with the CAISO and therefore a separate BPM that covers only EIM matters would make the organization and administration more efficient and less cumbersome.