

Salt River Project “SRP”
Comments on CAISO’s Energy Imbalance Market Governance Proposal, dated August 13, 2013

SRP¹ appreciates the opportunity to continue participating in CAISO’s EIM stakeholder process. Establishing the appropriate governance structure is a critical component of implementing the EIM. SRP believes that the CAISO’s governance proposal provides a solid framework to accomplish the goal.

SRP offers the following recommendations related to the Transitional Committee:

1. SRP recommends that each of the six sectors be represented on the Transitional Committee. Although nominations were required to come from each sector, it wasn’t clear that the ISO Board would have to choose a candidate from each segment.
2. Furthermore, SRP recommends that each stakeholder sector only rank the nominees within their respective sector. The proposal appears to indicate that each stakeholder sector would rank all nominees. It is not appropriate for other sectors to weigh in and rank another sector’s candidates. The ultimate purpose is for the approved member to represent its sector on the Transitional Committee.
3. SRP recommends that each sector be represented by two (2) Transitional Committee members. The volunteer Transitional Committee members will need to accomplish a tremendous amount of work that has lasting consequences. Two members per sector will help share the responsibilities while still keeping the committee at a reasonable size. Additional members will also help to achieve CAISO’s stated goal of geographic diversity. Finally, with only one member per sector, it will be difficult to select one member that represents the perspectives of that entire sector.
4. SRP recommends that the CAISO clarify that the CAISO staff person assigned to the Transitional Committee will provide or arrange for administrative support in addition to attending meetings and advising the Committee.

Thank you in advance for your consideration.

¹ SRP (Salt River Project Agricultural Improvement and Power District) provides electricity to over 950,000 power users in a 2,900 square-mile service area in parts of three Arizona counties – Maricopa, Gila and Pinal. SRP’s infrastructure includes 45 generating units, 300+ substations, 3,072 transmission line miles and 19,005 distribution line miles.