

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Bonnie Blair Rebecca Sterzinar	Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California ("Six Cities")	September 6, 2013

Please use this template to provide your comments on the Energy Imbalance Market Governance White Paper posted on August 13.

Submit comments to EIM@caiso.com

[Comments are due September 6, 2013 by 5:00pm](#)

Please provide your comments following each of the topics listed below:

- 1. Do you support the roles identified for the transition committee – i.e., to provide the Board with input on EIM-related issues during start-up and early implementation and to develop a proposal for an independent governance structure? Please explain the basis for your views.**

Comments:

The Six Cities do not at this time take a position with respect to the roles identified for the transition committee.

- 2. Do you support the sector definitions and the nomination and ranking process for the transition committee? Please explain the basis for your views.**

Comments:

With respect to the sector definitions, the ISO's proposal to have one sector that encompasses all publicly-owned utilities is problematic. Publicly-owned utilities within the ISO may have interests that are very different from the interests of publicly-owned

utilities located outside of the ISO. The same is true with respect to investor-owned utilities. It may be beneficial to create additional stakeholder sectors so that utilities located within the ISO will be included in separate sectors from those utilities that are located outside of the ISO. Alternatively, rather than having only one representative for all publicly-owned utilities included as part of the transition committee, the Six Cities recommend electing two representatives from the publicly-owned utilities sector – one representative that is located within the ISO and one that is located outside of the ISO.

At this time, the Six Cities do not take a position with respect to the nomination and ranking process for the transition committee.

3. Do you support the number of members in the transition committee and its composition? Please explain the basis for your views.

Comments:

As explained in response to Topic 2, the Six Cities do not support the number of members in the transition committee to the extent that the committee would include only one member from each sector, despite the fact that certain sectors may include entities with very different interests. As noted, publicly-owned utilities within the ISO may have interests that differ from the interests of publicly-owned utilities located outside of the ISO. Therefore, the ISO's proposal to appoint only one representative from the publicly-owned utility sector is inadequate to effectively represent the interests of all stakeholders included in that sector.

4. Do you support the independence proposals identified in the paper for long-term independent EIM structure? Please explain the basis for your views.

Comments:

The Six Cities do not take a position at this time as to the independence proposals for long-term independent EIM structure.

5. Are there details not covered here that you would suggest be included in the next round that will include a draft charter?

Comments:

The Six Cities have identified no details that are not covered here that should be included in the next round.

6. Any other comments?

The Six Cities have no additional comments at this time.