



EIM Governance Review Issue Paper & Straw Proposal

**Supplemental Public Generating Pool Comments
January 25, 2019**

The Public Generating Pool (PGP) submitted comments on the California ISO's Energy Imbalance Market (EIM) Governance Review Issue Paper and Straw Proposal on January 18, 2019¹. PGP submits these supplemental comments clarify statements made in its initial comments regarding governance for any extension of the day-ahead market to EIM Entities.

In its January 18, 2019 comments, PGP stated that the governance changes PGP proposes for the EIM Governance Review can lay the groundwork for the potential extension of CAISO's day-ahead market to EIM Entities (EDAM) by demonstrating CAISO's willingness to assure non-California parties' interests are represented through decision by an independent, non-affiliated governing body on all issues impacting the EIM and any future expansion of the EIM. By this statement, PGP is not suggesting that the changes we proposed for the current EIM Governance Review are sufficient for an EDAM governance structure, but rather that these changes are not in conflict with changes needed for EDAM. In other words, making these changes to the EIM Governance Structure now is not wasted work.

PGP understands that an EDAM governance structure requires a separate stakeholder process that entails a comprehensive review of all governance elements and any PGP comments on an EDAM governance structure will be made during that process. CAISO has noted that such a review will occur as part of the EDAM stakeholder initiative scheduled to begin in the 3rd quarter of 2019.

¹ <https://www.westerneim.com/Documents/PGPComments-EIMGovernanceReviewIssuePaperandStrawProposal.pdf>

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