

**Comments of VIASYN
Energy Imbalance Market Draft Final Tariff Language**

Submitted by	Company	Date Submitted
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VIASYN appreciates the opportunity to comment on the Energy Imbalance Market (EIM) Draft Final Tariff Language. VIASYN supports the EIM Initiative.

The comments below are in association with EIM Participating Resource Scheduling Coordinator disclosure requirements.

EIM PRSCs should not be required to disclose client list to Participating Resources

EIM Participating Resource Scheduling Coordinators (EIM PRSCs) should not be required, pursuant to proposed Tariff Section 29.4(e)(3)(C), to certify that it has disclosed its complete list of clients and client resources to its client-base. This type of disclosure is not required in the existing CAISO Service Territory and provides no fair and defensible benefit to the stakeholders involved.

Indeed, the only benefits that could result from such a disclosure is (1) non-market-based asymmetric information advantages for Participating Generators in the negotiation of contracts with Scheduling Coordinators, and (2) collusion and/or anti-competitive behavior on the part of Participating Generators (who in many instances are also a Scheduling Coordinator) to run a competing Scheduling Coordinator out of the market. We view neither of these consequences of such a disclosure as legitimate, and encourage CAISO to remove this clause all together.