

Western Area Power Administration (Western) appreciates the opportunity to provide the following supplemental comments on specific items related to the CAISO EIM 3rd Revised Straw Proposal and Governance.

The manner in which the EIM structures transmission services related to transmission used for transfers within and between BAAs within the EIM footprint is an area of concern for Western. The EIM is proposing to track transmission utilization through an after the fact dynamic tagging process. Western operates 3 of the 6 constrained paths within the Western Interconnection. At times unscheduled EIM flows may have a direct impact one or more of these constrained paths. Western feels strongly that the EIM must have the ability to track transmission utilization on a path specific real time basis differentiating between normal inadvertent power flows and EIM flows in order to have the ability to accurately manage congestion associated with EIM activities within our specific BAA. Western also believes that some form of loss recovery and transmission revenue recovery mechanism must be developed for transmission utilization across the EIM.