

Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide written comments on the EIM Governance straw proposal posted on March 19, 2015.

[Please submit comments to EIM@caiso.com](mailto:EIM@caiso.com) by close of business April 16, 2015

The straw proposal is available on the ISO website at:
http://www.caiso.com/Documents/StrawProposal-LongTermGovernance_EnergyImbalanceMarket.pdf

The slides presented during the March 31, 2015 stakeholder meeting are available at:
http://www.caiso.com/Documents/Agenda_EnergyImbalanceMarketGovernance-StrawProposal.pdf

The EIM Transitional Committee welcomes and appreciates stakeholder feedback related to the straw proposal for the EIM Governance initiative. Please use the following template to comment on the key topics addressed in the proposal:

Structure - composition of the Nominating Committee, composition of the EIM governing body, and process for selecting members.

Thank you for the opportunity to offer input. WPTF appreciates all the hard work the Transition Committee is doing to develop a thoughtful proposal. WPTF offers only this limited comment at this time – a perspective that seems to not have been raised by other parties thus far.

WPTF is concerned that there is no Marketer/Trader representation on the proposed nominating committee. Especially in light of the noncontiguous nature of the expanding EIM footprint boundaries, the EIM structure poses significant challenges for the bilateral market-to-organized market marriage. Importing through an EIM where TAC treatment may be different in the real-time EIM than it is in the forward CAISO market and participating in the EIM across EIM boundaries are two examples of situations that very much affect marketers but may affect internal suppliers, PTOs and IOUs to a lesser degree or in a different manner.

Because of this we request that the Transition Committee give consideration to adding

<p>Marketer/Trader representation to the nominating committee. Thank you for your consideration.</p>
<p>Scope of authority – scope of authority, including whether it is appropriate and workable, the examples of issues that would fall within the primary and secondary authority of the EIM governing body, and process for resolving disagreements about the particular proposed rule changes or the scope of authority generally.</p>
<p>Comment:</p>
<p>Documentation – documentation of these arrangements in the ISO’s bylaws and a charter from the ISO Board of Governors, and mission of the EIM governing body that would be identified in its charter</p>
<p>Comment:</p>
<p>Committee of regulators – composition, including the balance of representation between state commissions and public power, and role of the committee</p>
<p>Comment:</p>
<p>Trigger for re-evaluating EIM governance</p>
<p>Comment:</p>
<p>Criteria for evaluating proposals – to revise and simplify the criteria for evaluating governance proposals, as reflected in the appendix</p>
<p>Comment:</p>
<p>Miscellaneous items – Please provide comments to other aspects of the straw proposal or governance related issues here.</p>