



**EIM Governance Review**  
**Revision of Decisional Classification Rules**  
**Draft Final Proposal**

**Public Generating Pool Comments**  
**February 22, 2019**

The Public Generating Pool (PGP) appreciates the opportunity to comment on the California ISO's Energy Imbalance Market (EIM) Governance Review Draft Final Proposal on Revision of Decisional Classification Rules dated February 11, 2019. PGP represents ten consumer-owned utilities in Oregon and Washington that own almost 6,000 MW of generation, 4,500 MW of which is hydro and 95% of which is carbon-free. Three of the PGP members operate their own Balancing Authority Area (BAA), while the remaining members have service territories within the Bonneville Power Administration's (BPA) BAA.

On the stakeholder call held on February 19<sup>th</sup>, CAISO stated that its proposal to incrementally expand the primary authority of the EIM Governing Body to include proposed changes to generally applicable rules of the real-time market if the primary driver for the change is EIM is a relatively narrow modification that will likely not result in much change regarding how policy initiatives are classified for decision-making purposes. PGP would like to better understand the impact of this proposal and requests CAISO provide a list of policy initiatives that would change from being classified as under the EIM Governing Body's advisory authority to primary authority based on this change.

While PGP supports the Draft Final Proposal, PGP believes this change does not add much value or clarity in how initiatives are delineated between the EIM Governing Body and ISO Board of Governor's primary authority. PGP continues to believe that the EIM Governing Body should be given primary authority over generally applicable rules of the real-time market, regardless of the driver of the change, unless the market change applies uniquely to the CAISO Balancing Authority Area and has no impact to the EIM. This definition would provide clear delineation around the decision-making authority over policy initiatives from the beginning and not be dependent on a subjective evaluation of the motivation behind a change. PGP also believes it is very important for the EIM Governing Body to have primary authority over the Extended Day-Ahead Market (EDAM) initiative.

PGP was pleased to hear on the February 19<sup>th</sup> stakeholder call that this draft final proposal is not a substitute for a broader EIM Governance Review. PGP believes the broader EIM Governance Review is necessary and timely and hopes to see next steps determined in an expeditious manner. PGP requests CAISO provide more information regarding the timing, process and scope of establishing a potential Governance Review Committee to conduct the broader review. PGP also requests more information regarding the opportunities stakeholders will have to provide input into the process.

Comments submitted by:

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