

# Comments of Seattle City Light on EIM Governance Review Straw Proposal and Draft Charter

Submitted by	Company	Date Submitted
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Seattle City Light (Seattle) is the tenth largest consumer owned electric utility in the nation, providing electrical service to more than 450,000 residential, commercial, and industrial customers in the City of Seattle, Washington and six adjacent cities. Seattle owns and operates hydroelectric resources with approximately 2,000 MW of flexible, fast-ramping capacity. We regularly transact in the wholesale energy and transmission markets. Seattle executed an Implementation Agreement with the California Independent System Operator (CAISO) and intends to begin participating in the Western Energy Imbalance Market (EIM) in April 2020.

Thank you for the opportunity to comment on CAISO’s *EIM Governance Review Straw Proposal and Draft Charter*. Seattle also submits joint comments as part of the EIM Entities and Public EIM Entities groups. As described in more detail in the afore-mentioned comments, on the timing and scope of the governance review proposed by CAISO we recommend the actual review of the GRC occur after the results of the EDAM feasibility assessment. Once this is complete, a determination could be made as to scope of the governance review and whether it would include EDAM. We support the sector representation and nomination process described in the *Straw Proposal* with the exception that we recommend that only BAA’s that have signed an implementation agreement be included in the EIM entity sector, as described more fully below. We also recommend that the CAISO board of governors and EIM governing body representation on the governance review committee be advisory in nature. Finally, we support the process outlined in the *Straw Proposal* that provides stakeholders a role to identify and rank candidates for the governance review committee but gives the board of governors and EIM governing body the discretion to select committee members from the ranked slate. We further support the comments of the EIM entities and the Public EIM entities that recommend metrics that would provide guide posts on how that discretion is exercised.

Seattle also largely supports Public Power Council’s (PPC) comments. Seattle agrees with PPC’s suggestion that the CAISO board and EIM governing body acknowledge and account

for the diversity of public power perspectives and ensure adequate public power representation in the final selection of governance review committee (GRC) nominees. We also agree with PPC that BPA is a unique entity with diverse ownership of generation in its BAA and specific statutory obligations and this should be considered in selecting from the final slate of GRC nominees. Where our recommendations differ from that of PPC is that we recommend that only balancing authorities that have signed an EIM entity agreement be defined as an EIM entity and included in the EIM entity sector. We recommend that instead of including BAAs that have entered into a formal process to *consider* joining the EIM in the EIM entity sector, that CAISO create an additional sector to account for entities that are in neighboring balancing authority areas but have not yet signed an EIM implementation agreement.

Thank you for the opportunity to comment and if you have any questions please contact Lea Fisher at [Lea.Fisher@seattle.gov](mailto:Lea.Fisher@seattle.gov) (206) 386-4546 or Josh Walter at [josh.walter@seattle.gov](mailto:josh.walter@seattle.gov) (206) 684-3654.