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Sierra Club Comments on Joint Agency Workshop

Additional submitted attachment is included below.



August 2, 2016

California Energy Commission
Docket Office
1516 Ninth Street
Sacramento, California 95814

Re: Sierra Club Comments on Joint Agency Workshop (Docket No. 16-RGO-01)

Sierra Club California hereby submits these comments to California Energy Commission Docket No. 16-RGO-01 in response to the July 26, 2016 Joint Agency Workshop addressing the California Independent System Operator's (the "CAISO") SB350 studies and the latest revisions to the proposed principles for governance of a regional ISO ("Revised Governance Proposal"). Sierra Club previously submitted comments on July 7 in this docket addressing the last iteration of the Governance Proposal. Sierra Club reiterates by references the concerns raised in those comments.

Sierra Club has not yet completed its review of the SB350 studies. CAISO granted Sierra Club access to the confidential data supporting the studies on June 16, 2016. However, due to scheduling conflicts and limited availability, Sierra Club has not yet completed its review of the study and supporting data. Sierra Club intends to provide more detailed supplemental comments in mid-August.

Sierra Club notes with concern that the Revised Governance Proposal stripped out the previously proposed development of greenhouse gas ("GHG") policies. The issue of GHG tracking and regulation is a paramount concern for Sierra Club, and the removal of the GHG principles further heightens Sierra Club's fear that the proposed transformation of the CAISO into a regional system operator ("RSO") would, as it is currently contemplated, risk abdicating California's leadership on climate issues.

Sierra Club appreciates the opportunity to provide these comments and will provide supplemental comments at a later date.

Sincerely,

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