

DOCKETED

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PGP Comments on ISO's Revised Governance Principles

Additional submitted attachment is included below.



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August 2, 2016

via e-mail: California Energy Commission

Subject: Regional Grid Operator and Governance

Docket No. 1-RGO-01

The Public Generating Pool (PGP) is composed of nine consumer-owned electric utilities in Washington and one consumer-owned electric utility in Oregon. Collectively, PGP member utilities serve approximately two million people with a 6,000 MW utility-owned asset base that is 96% carbon-free. PGP submitted comments on the initial Principles for Governance of a Regional ISO and appreciates the opportunity to comment on the Revised Principles for Governance of a Regional ISO (Revised Proposal).

PGP would like to commend the California ISO for many of the modifications made between the initial draft and the Revised Proposal. We appreciate the elimination of the Interim Board and agree that greenhouse gas accounting issues are better addressed in another forum. The clarity provided to the composition and responsibilities of the Transitional Committee is helpful. We fully support representation of the Federal Power Marketing Administrations on the Western States Committee. There are a few additional areas that we believe still require modification.

Western States Committee

To assure that the Western States Committee can fully represent all interests in the West, we recommend that the requirement for the public power representative be from within the ISO footprint be removed. Alternatively, we recommend that an additional public power non-voting representative from outside the ISO footprint be added to the Committee.

Market Advisory Committee

Given the significant impacts associated with market design, a Market Advisory Committee (or equivalent concept) is essential to the governance structure to assure appropriate representation on these issues. This is an essential feature of the overall governance structure because this Committee assures that the Board is informed of the impacts to market participants in a formal way and does not rely solely on the ISO staff to attempt to reflect those interests.

It is not sufficient to simply have this concept addressed by the Transitional Committee, as written in the Revised Proposal. We recommend that the final governance proposal that is provided to the California Governor include a commitment to develop a Market Advisory Committee that has a direct line of communication to the Board and provides for representation of all ISO stakeholders, including those that are not within the ISO footprint.

Sincerely,

A handwritten signature in dark ink, appearing to read "Therese Hampton", is written in a cursive style.

Therese Hampton, Executive Director
Public Generating Pool

Public Generating Pool

Chelan County PUD / Clark Public Utilities / Cowlitz County PUD / Douglas County PUD / Eugene Water & Electric Board
Grant County PUD / Klickitat County PUD / Lewis County PUD / Pend Oreille County PUD / Snohomish County PUD / Tacoma Power