

## EIM Body of State Regulators – Feedback Survey Results

September 26, 2017

**Since the EIM BOSR was first formed in the fall of 2015, how successful has the group been in focusing on its purpose, as stated in the EIM Governance Charter, and the EIM BOSR Charter?**

<b>Contact:</b>	<b>Response:</b>
John Prescott, Western EIM Governing Body	Very successful due in large part to BOSR leadership. The addition of the staff committee was a great idea.
Unknown	Very Successful--well done getting the BOSR formed and beginning the education process of the EIM as it was expanding.
Mariah Kennedy, Puget Sound Energy	The EIM BOSR has been successful in fulfilling its purpose since it was formed in 2015. The level of discussion during BOSR meetings and BOSR member comments and questions in various forums indicate a growing level of knowledge about the EIM.
Kristine Schmidt, Western EIM Governing Body	BOSR has been very effective forming a sustainable platform to discuss EIM related issues and forming a consensus perspective to provide input to the EIM Governing Body. The creation of the Staff Advisory Committee was an excellent decision and a very productive way of getting in depth technical advice from the region.
Tony Braun, Braun Blasing Smith Wynne, P.C., Counsel to the California Municipal Utilities Association	The California Municipal Utilities Association (CMUA) applauds the work of the BOSR to organize state commission input and educate commissioners and staff on complex market issues. Its mere existence furthers sound policy discussions on wholesale market design choices. CMUA would encourage growth of this strong beginning with regular input from the BOSR on market design choices.
Robin Cross and Lea Fisher, Seattle City Light	From City Light's perspective, the EIM BOSR has successfully achieved its purpose of learning about the EIM, the EIM Governing Body and relevant CAISO developments. The BOSR meetings have been focused on relevant EIM related issues and CAISO initiatives and have spurred discussion and learning on these topics.
Valerie Fong, Western EIM Governing Body Member	The BOSR has executed on its purpose very effectively, has performed its duties on the nominating committee admirably, and has provided valuable insights to the WEIM Governing Body. Based on the active participation of its members, the educational role that the BOSR fulfills is a success.
Christine Kirsten, PacifiCorp	The EIM BOSR has been successful in focusing on its purpose as stated in the EIM Governance Charter and the EIM BOSR Charter.

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**Since the EIM BOSR was first formed in the fall of 2015, and in light of the establishment of the EIM Governing Body, do you believe that the purpose and objectives of the EIM BOSR have changed? If yes, what do you see as the objectives and purpose of the EIM BOSR and do you have any recommendations on how the EIM BOSR can address those objectives?**

<b>Contact:</b>	<b>Response:</b>
John Prescott, Western EIM Governing Body	No change
Unknown	The purpose and objectives haven't changed, but they have matured. Expect they will be assessing real events/experience of EIM entities in light of evolving energy industry policies.
Mariah Kennedy, Puget Sound Energy	<p>At the present time, the purpose and objectives of the BOSR should be as follows: (1) serve as a forum for state regulators to become educated about the EIM and how it may impact regulatory policy in their respective jurisdictions; (2) BOSR members should help inform the other commissioners in their respective jurisdictions about the impacts that their decisions may have on the EIM, and vice versa; and (3) BOSR members should discuss and collaborate on the harmonizing of state policies against the backdrop of a regional energy market.</p> <p>One beneficial work product might be for the BSOR to publish a report/document that identifies the policies in each jurisdiction that impact the EIM.</p>
Kristine Schmidt, Western EIM Governing Body	While I do not believe the purpose or objectives have changed, I do continue to view the BOSR as a critical input into the EIM Governing Body's decision making process. Have a sense of the state regulatory commissions and staff is critical for the EIM Governing Body to make robust and informed decisions.
Tony Braun, Braun Blasing Smith Wynne, P.C., Counsel to the California Municipal Utilities Association	Like the Regional Issues Forum, CMUA sees the BOSR as being an essential part of EIM governance. The role of the BOSR should be to inform both the EIM Governing Body and the state decision-makers on the impacts of wholesale market design on state policy and consumer benefit.

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<p>Robin Cross and Lea Fisher, Seattle City Light</p>	<p>As the list of EIM entities continues to grow more states and state regulators will be impacted by EIM and CAISO matters. For this reason, it seems more appropriate than ever to maintain the purpose and objectives of the BOSR to learn about the EIM and CAISO matters. As a practical matter, as the list of EIM entities grows, it is possible there may also be less ability for the BOSR to reach consensus on issues and express a common position at the ISO. Notwithstanding this possibility, it seems appropriate to maintain the current objectives and purpose of the BOSR at this time, while recognizing that these may change in the future.</p>
<p>Valerie Fong, Western EIM Governing Body Member</p>	<p>As the market evolves, the BOSR needs to also evolve. At this point in time, in representing its various states, the BOSR can be a great help in identifying possible roadblocks to future market changes as they take form.</p>
<p>Christine Kirsten, PacifiCorp</p>	<p>The purpose of the BOSR has not really changed.</p>

### Looking forward over the 12 months and again over 24 months, what does success look like for the EIM BOSR?

Contact:	Response:
<p>John Prescott, Western EIM Governing Body</p>	<p>Meeting the three stated purposes in section 5.1.2 of the Charter for Energy Imbalance Market Governance.</p>
<p>Unknown</p>	<p>Going beyond "current events" of the EIM, and bring "look ahead"/strategic issues to the EIM Governing Body.</p>
<p>Mariah Kennedy, Puget Sound Energy</p>	<p>Success for the BOSR over the next 12 to 24 months would be effectively accomplishing the purposes and objectives set forth in the response to Question 3 above.</p>
<p>Kristine Schmidt, Western EIM Governing Body</p>	<p>Success would be more active and engaged discussions around policy initiatives for the EIM and for non-stakeholder issues that deserve broad western discussion. While some of the states have limited resources, the BOSR and SAC should be a source of information and sharing of technical and policy concerns. Success would also have all states active and engaged on pending and prioritized policy initiatives.</p>
<p>Tony Braun, Braun Blasing Smith Wynne, P.C., Counsel to the California</p>	<p>(1) Increased interaction with the EIM Governing Board and the RIF; (2) more public dialogue on particular issues related to the market, such as the treatment of Renewable Energy Credits under state law and the interaction with wholesale market design; (3) more regularization of in-person meetings.</p>

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Robin Cross and Lea Fisher, Seattle City Light	City Light believes the EIM BOSR success will continue to rely on learning as much as it can about EIM and CAISO matters that impact its jurisdictions and engaging its members and interested stakeholders. To that end, the EIM BOSR could help achieve that goal by inviting CAISO presenters or other stakeholders to share knowledge with the EIM BOSR on relevant issues. This may help drive participation and engagement and increase learning.
Valerie Fong, Western EIM Governing Body Member	Over the next 12 months, key to BOSR's success will be a smooth transition as new players take on the responsibility of Chair or Vice Chair. Ensuring continuity into the next 24 months will be very important.
Christine Kirsten, PacifiCorp	The BOSR provides an educational value for the state regulatory agencies and opportunities for states to convey positions on policy to the EIM Governing Body. The BOSR is on the right track.

**Given the initiatives that are likely to come before the EIM Governing Body for decision over the next 12-24 months, how can the EIM BOSR be most effective?**

Contact:	Response:
John Prescott, Western EIM Governing Body	Assuring that the respective state regulators and their staffs understand key WEIM initiatives.
Unknown	Engage on implications of possible western regionalization--awareness of what a transition would entail.
Mariah Kennedy, Puget Sound Energy	BOSR members can be most effective on any given initiative by ensuring that they fully understand the initiative and the impacts that decisions made in their jurisdictions may have on the EIM, and discussing ways that they might be able to harmonize the policies in their respective states.
Kristine Schmidt, Western EIM Governing Body	The SAC has become a valuable resource where the more technical issues are analyzed and recommendations on positions provided to BOSR.
Tony Braun, Braun Blasing Smith Wynne, P.C., Counsel to	The BOSR's sweetspot is in the area of the intersection of market design and state policy. Areas relevant to the EIM that fall within this area are: (1) accounting for carbon emissions; (2) REC

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the California Municipal Utilities Association	treatment from state to state within the EIM footprint; (3) accounting for benefits.
Robin Cross and Lea Fisher, Seattle City Light	City Light believes it would be useful for the EIM BOSR to provide more detail on the deliberations of the EIM BOSR and its Staff Advisory Committee in developing its recommendations to the EIM Governing Body with regard to CAISO initiatives. This could be in the form of additional verbal information at EIM Governing Body meetings when presenting a recommendation or a short written memo summarizing the EIM BOSR's position on an initiative and its process in reaching this position. The EIM BOSR reflects an important perspective on CAISO/EIM issues and the EIM governing body and all CAISO stakeholders would benefit from better understanding EIM BOSR's views, concerns and positions on various initiatives.
Valerie Fong, Western EIM Governing Body Member	The BOSR will be most effective if it can clearly articulate concerns of its members with any new initiatives, and the reasons for support of new initiatives.
Christine Kirsten, PacifiCorp	I believe the BOSR has already become more effective since establishing the staff advisory team. The staff advisory team is able to study initiatives and educate, brief, and provide recommendations to the BOSR.

**Are there any changes that should be made to the EIM Governance Charter related to the EIM BOSR, or to the EIM BOSR Charter to better align with the current purpose and objectives of the BOSR?**

<b>Contact:</b>	<b>Response:</b>
John Prescott, Western EIM Governing Body	No.
Unknown	None come to mind.
Mariah Kennedy, Puget Sound Energy	The current charter sufficiently captures the first two purposes set forth in the response to question 3 above.
Kristine Schmidt, Western EIM Governing Body	No response

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<p>Tony Braun, Braun Blaising Smith Wynne, P.C., Counsel to the California Municipal Utilities Association</p>	<p>With respect to the BOSR Charter, CMUA would encourage the BOSR to consider changes. Specifically, the Purpose and Responsibilities section seems vague. CMUA would suggest that the process for taking common positions could be further developed.</p> <p>Also, since the BOSR has formed a staff support committee, it is appropriate to consider providing detail on the role of the committee and its responsibilities and procedures also.</p>
<p>Robin Cross and Lea Fisher, Seattle City Light</p>	<p>City Light does not believe any changes to the EIM Governance Charter or EIM BOSR Charter are necessary at this time.</p>
<p>Valerie Fong, Western EIM Governing Body Member</p>	<p>I don't think the BOSR charter mentions a Vice Chair, however, I may not have been looking at the most current version. If not, I would suggest updating the Charter.</p>
<p>Christine Kirsten, PacifiCorp</p>	<p>No.</p>

### How should the EIM BOSR provide an opportunity for stakeholders to communicate on EIM BOSR calls and in meetings?

Contact:	Response:
<p>John Prescott, Western EIM Governing Body</p>	<p>Based on the Charter for the Energy Imbalance Market Governance, I believe the BOSR should focus on the regulators and their staffs. The Regional Issues Forum is the proper venue for other stakeholders.</p>
<p>Unknown</p>	<p>Nothing special required beyond standard engagement opportunities (phone conferencing and attendance at BOSR meetings.)</p>
<p>Mariah Kennedy, Puget Sound Energy</p>	<p>The EIM BOSR should provide an opportunity for stakeholders during a public comment period at meetings and in writing.</p>
<p>Kristine Schmidt, Western EIM Governing Body</p>	<p>No response</p>
<p>Tony Braun, Braun Blaising Smith Wynne,</p>	<p>It is likely that this question is issue specific. If there a major and complex market issues to be discussed at the meeting, it may be appropriate for the BOSR to allow public comment similar to the</p>

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P.C., Counsel to the California Municipal Utilities Association	EIM Governing Body structure. It would also be helpful for market participants to know the opinions of individual states on issues.
Robin Cross and Lea Fisher, Seattle City Light	The EIM BOSR leadership has done a good job of encouraging all stakeholders to participate on calls and in meetings. In order to increase participation, a specific period of time could be built into meeting agendas for “discussion” among stakeholders. In addition, the BOSR could invite individual stakeholders to present/provide feedback on certain agenda items at meetings.
Valerie Fong, Western EIM Governing Body Member	The meetings to date have been well-run and organized. I am in full support of continuing in that vein. In terms of stakeholder communications, I have never had the sense that such communications were precluded. One idea might be to include a spot on the agenda after an item is discussed seeking public comment.
Christine Kirsten, PacifiCorp	I'm not sure there is a need for stakeholders to communicate in BOSR calls and meetings, as I see it as more of a forum for the benefit of educating state regulators and informing the EIM Governing Body on state regulators' positions.

**Do you have any opinion regarding the frequency of BOSR meetings? For example, monthly, quarterly, coincident with CREPC meetings or on an as needed basis?**

<b>Contact:</b>	<b>Response:</b>
John Prescott, Western EIM Governing Body	Given the workload of most regulators I suggest the meetings be held only as needed...as determined by the BOSR leadership in consultation with the Governing Body leadership. While guidance for each Governing Body vote or advice is appreciated, it is not a requirement.
Unknown	Quarterly
Mariah Kennedy, Puget Sound Energy	The BOSR should meet monthly (or at least for longer meetings quarterly) due to the highly complex and dynamic nature of the market, and the policy decisions that shape it.
Kristine Schmidt, Western EIM Governing Body	No response

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<p>Tony Braun, Braun Blasing Smith Wynne, P.C., Counsel to the California Municipal Utilities Association</p>	<p>CMUA would encourage at least quarterly meetings of the BOSR to allow for continuous and meaningful engagement on market issues. The market is constantly changing and less frequent meetings would marginalize effectiveness. CMUA would expect that staff committees supporting the BOSR would need to meet more frequently.</p>
<p>Robin Cross and Lea Fisher, Seattle City Light</p>	<p>The BOSR has been convening on a nearly monthly basis and this seems like an appropriate frequency. One way to possibly encourage additional engagement in meetings would be to increase the meeting length from 1 hour to 1.5 hours. This might encourage more robust discussion of issues.</p>
<p>Valerie Fong, Western EIM Governing Body Member</p>	<p>To date, the meetings have been timely, well organized and effective. Having the WEIM "rolling calendar" has been very helpful, and it is incumbent on CAISO staff and the WEIM Governing Body to keep that calendar updated. This should help both the RIF and BOSR with the timing of their respective meetings.</p>
<p>Christine Kirsten, PacifiCorp</p>	<p>Monthly seems appropriate.</p>