



**PACIFICORP'S COMMENTS ON THE
ENERGY IMBALANCE MARKET REGIONAL ISSUES FORUM
REEVALUATION DISCUSSION DRAFT
February 22, 2017**

I. INTRODUCTION

PacifiCorp hereby submits the following comments to the Energy Imbalance Market ("EIM") Regional Issues Forum ("RIF") on the EIM RIF Reevaluation Discussion Draft that was published February 7, 2017. PacifiCorp appreciates the opportunity to provide comments on this initiative for the RIF's consideration.

II. COMMENTS

The RIF has published the Discussion Draft and requested stakeholder feedback on issues related to how the reevaluation stakeholder process should be conducted. PacifiCorp understands and agrees with the RIF's desire to find a meaningful place within the EIM governance structure or else be allowed to expire. PacifiCorp's comments on the Discussion Draft are as follows.

A. Stakeholder Process for Reevaluation of the RIF

- 1. The first question centers around the structure of the reevaluation process. It is the Liaisons' understanding that the ISO will run a traditional ISO-driven stakeholder process for this effort. The Liaisons would like this to be a bottom-up process shaped by stakeholder input and that is one of the purposes of this initial Discussion Draft. We would benefit from stakeholder feedback on the role of the RIF Liaisons in this process. Should we serve to channel stakeholder feedback? Should we be making affirmative recommendations? Should we go so far as the EIM Transitional Committee to develop comprehensive work products?*

PacifiCorp supports the RIF using the ISO's resources for structural and logistical purposes, including communications via ISO market notices and meeting logistics. However, PacifiCorp believes that the RIF liaisons should be responsible for the content of the RIF discussions and stakeholder feedback. Furthermore, the RIF is a forum to collect, channel, and discuss stakeholder feedback on EIM-related issues, and because of the diversity of the group, the RIF liaisons would rarely, if ever, reach the consensus required to make recommendations for policy decisions to the EIM Governing Body. The RIF provides more value as a forum for stakeholder education

and discussion. Similarly, PacifiCorp believes that the RIF should not produce comprehensive work products, except perhaps summaries of stakeholder comments and viewpoints as may be helpful.

- 2. The RIF liaisons believe that the RIF reevaluation stakeholder process can be accomplished in a relatively short amount of time and with minimal process. As such, the RIF liaisons recommend that the RIF reevaluation stakeholder process consist of a combined issue paper/straw proposal developed by the RIF liaisons, followed by no more than two stakeholders meeting, and commensurate numbers of iterative comment and proposal rounds. Indeed, this could be accomplished with one round of comments and a meeting, followed by a final work product. Do you agree with this recommendation? If your response is no, please explain and provide your suggestion for what process should be used. For example, should there be multiple rounds of stakeholder input (written comments), multiple meetings or multiple revisions to proposal documents?*

PacifiCorp agrees with the RIF that the reevaluation stakeholder process can be accomplished in a short period of time with a minimal process. PacifiCorp recommends and encourages the parties to do what can be done to ensure the process is streamlined as much as possible.

- 3. The RIF liaisons recommend that the RIF reevaluation final proposal and stakeholder feedback be presented to the EIM Governing Body for the ultimate decision and resolution under the current voting structure of the EIM Governing Body. Do you agree with this recommendation? If your response is no, please explain and provide your suggestion for what resolution process should be used.*

PacifiCorp supports keeping decision-making for the RIF reevaluation with the RIF liaisons. PacifiCorp does not anticipate that the decision would be controversial, and therefore believes it is appropriate for the RIF liaisons to make the decision through consensus, and not require a decision on reevaluation from the EIM Governing Body.

- 4. The RIF liaisons recommend that the RIF reevaluation stakeholder process be completed by the July 13, 2017 meeting of the EIM Governing Body. Do you agree with this recommendation? If your response is no, please explain and provide your suggestion for what timeline should be used.*

As stated in its response to the third question above, PacifiCorp supports empowering the RIF liaisons to make the decision on reevaluation. As a result, it would not be

necessary to wait until July. The RIF liaisons could communicate its decision at the next RIF meeting, or perhaps through a written announcement via a market notice distributed by the ISO.

B. Relationship to EIM Governing Body and Other Topics

5. Right now, the RIF meets 3 times per year. Suggestions have been made to align RIF meetings with the EIM Governing Body schedule. That would increase time and meeting commitment, but would regularize RIF input into the Governing Body. Input on this issue would be valuable. The Liaisons believe that the EIM Governing Body should have a strong role in setting the agenda for the RIF to ensure feedback into the issues on which they must deliberate. We would appreciate input on this initial recommendation.

PacifiCorp supports alignment of the RIF meetings with the EIM Governing Body meetings. PacifiCorp suggests that the subject matter of the RIF meetings could be staggered relative to the EIM Governing Body meetings in order to ensure that the RIF, the EIM Governing Body, and stakeholders have had enough time to discuss and understand the issues and stakeholder positions prior to discussing them at the EIM Governing Body meeting. For example, the RIF could meet the day before the EIM Governing Body meeting and discuss topic "B" and topic "A" would have already been discussed at the previously held RIF meeting. The EIM Governing Body meeting that takes place the day after the RIF discussion on topic "B" would address the topic "A" issues from the earlier RIF meeting. Further, aligning the meetings would provide the opportunity for the EIM Governing Body to attend the RIF meetings in person and hear first-hand the stakeholder discussions.

6. The expectation is that, in addition to the EIM Governing Body, agenda development and RIF meeting discussions would be led by stakeholders, channeled through the Liaisons for the purposes of organizing meetings. This is consistent with the last RIF meeting in Phoenix on November 29, 2016, where stakeholders led market issue discussions. It is expected that a primary role of the Liaisons will be to define a process for requesting agenda item. Meeting plans would establish deadlines for issue submissions or stakeholder presentations. Please provide thoughts on this general approach to RIF activities.

PacifiCorp agrees that it should be the responsibility of the stakeholders to take ownership of the EIM issues to be discussed at RIF meetings. As stated in its response

to the first question, PacifiCorp believes that in order to ensure that the RIF is productive, stakeholders must take the lead to present issues for discussion and the RIF's role is to provide a venue for and facilitate stakeholder discussion, and collect and present the stakeholder feedback to the EIM Governing Body.

7. *The existing documentation for the RIF contemplates the possibility of written work product as a means of capturing stakeholder views or RIF opinions. The Liaisons believe that if this function remains in any final recommendation, a process for triggering and producing written material must be developed. Stakeholder views on whether this function should remain, and how to execute upon it are appreciated.*

As stated above, PacifiCorp believes that the only written work product that may from time to time be helpful for the RIF to prepare would be summaries of stakeholder discussions or comments on a particular issue. The RIF's role should be to facilitate stakeholder discussion and collect stakeholder feedback for presenting to the EIM Governing Body.

8. *Is the RIF delivering on all of the key functions described in the operating guidelines? If your response is no, please explain and/or provide suggestions.*

PacifiCorp believes the RIF has adhered to the key functions described in the operating guidelines, and appreciates the contribution of the RIF liaisons. However, PacifiCorp encourages the RIF liaisons to review the current operating guidelines to determine whether or not revisions are appropriate based on stakeholder input from the reevaluation process. To the extent that the RIF liaisons agree that revisions are appropriate, PacifiCorp recommends that stakeholders be given the opportunity to provide comments, followed by the RIF liaisons finalizing the revisions using a consensus process.

9. *What should be the primary focus areas of the RIF?*

PacifiCorp believes that the primary focus of the RIF should be to facilitate stakeholder-led discussions on EIM issues, collect stakeholder feedback, and present stakeholder positions to the EIM Governing Body.

10. Are there, at this early stage, any provisions of the EIM Governance Charter or other RIF documents that stand out as needing reconsideration?

PacifiCorp does not at this time suggest reconsideration of any provisions of the EIM Governance Charter or other RIF documents.

III. CONCLUSION

PacifiCorp appreciates the opportunity to provide comments and the RIF's consideration of these comments.