



**PACIFICORP'S COMMENTS ON THE  
ENERGY IMBALANCE MARKET REGIONAL ISSUES FORUM  
REEVALUATION ISSUE PAPER  
May 3, 2017**

## **I. INTRODUCTION**

PacifiCorp hereby submits the following comments to the Energy Imbalance Market ("EIM") Regional Issues Forum ("RIF") on the EIM RIF re-evaluation issue paper dated March 31, 2017 ("Issue Paper"). PacifiCorp appreciates the opportunity to provide comments on the Issue Paper for the RIF's consideration.

## **II. COMMENTS**

The RIF developed the Issue Paper as part of the RIF re-evaluation process and requested stakeholder feedback on what changes, if any, should be made to the RIF role and how the RIF functions. PacifiCorp supports the RIF's proposed schedule for the re-evaluation process, which will conclude by July 13, 2017. PacifiCorp also agrees that the EIM Governance Charter should be revised to remove the current RIF re-evaluation language, and such language should be replaced with a provision that allows for the RIF to call for a re-evaluation of the RIF as circumstances may warrant without any predetermined trigger date. PacifiCorp further comments on the Issue Paper as follows.

### **A. RIF Meetings**

The RIF recommends that its meetings should occur at least three times per year, but can be more frequent if needed or requested by stakeholders, the EIM Governing Body, or the Body of State Regulators. The RIF further proposes that the meetings should align with EIM Governing Body meetings or other regional meetings when possible. PacifiCorp agrees with these proposals and the RIF's proposal that meetings will be publicly announced via ISO market notice 21 days in advance. PacifiCorp encourages the RIF Liaisons to determine meeting dates as far in advance as possible and to share those dates prior to an ISO market notice where possible, in order to allow parties advance notice for scheduling and arranging travel. Moreover, PacifiCorp agrees that meetings should align with EIM Governing Body meetings or other regional meetings when possible. PacifiCorp also agrees with the suggestion of the EIM Governing Body during its April 19, 2017, meeting that the RIF Liaisons and the EIM Governing Body will need to coordinate far in advance of the ISO market notice for aligned meeting dates.

## **B. RIF Written Work Products**

In the Issue Paper, the RIF proposes to add an additional officer role of secretary, to be selected by the RIF Liaisons, to accommodate broad stakeholder consensus that the RIF should at least produce meeting minutes that can serve as a written record of RIF discussions. As stated in its previously submitted comments on the RIF's discussion draft, PacifiCorp supports the proposal for the RIF to at least produce meeting minutes. Further, PacifiCorp agrees that it is reasonably necessary to add the additional officer role dedicated to produce the meeting minutes. PacifiCorp also agrees with the RIF that it should not lose the option to produce more substantive written products, such as a written opinion for the EIM Governing Body's review and consideration.

The RIF proposes in the Issue Paper that formal, substantive written opinions and recommendations would *only* be produced upon the specific request of the EIM Governing Body. However, during the April 19, 2017, EIM Governing Body meeting, the EIM Governing Body asked if there would ever be a time when the RIF produces a written opinion or recommendation without the EIM Governing Body requesting one. PacifiCorp believes that in the absence of the EIM Governing Body's request for a written opinion or recommendation, the RIF should have the option of producing such written product if it deems the written product is warranted. Moreover, PacifiCorp agrees that any request by the EIM Governing Body for a written opinion or recommendation should be made sufficiently in advance of any decision by the EIM Governing Body on a particular issue, or allow sufficient time for review and production of the work product for matters not scheduled for decision by the EIM Governing Body.

With respect to the issue of participation raised by Powerex in its comments on the discussion draft, PacifiCorp agrees with the RIF that the fact that there is a defined number of sectors does not delegitimize or disqualify the RIF from producing work products. This structure has worked successfully in other sector-driven efforts, such as the EIM Nominating Committee and the EIM Transitional Committee. In addition, PacifiCorp agrees that the RIF has been and remains open to full participation by any interested party and meetings and documents are subject to the rules of the ISO that seek to ensure transparency. PacifiCorp appreciates the RIF's efforts to coordinate with the EIM Body of State Regulators and the EIM Governing Body to improve processes and lessen the burden to participate.

With regard to EIM Governance Charter Section 6.1.1, that currently states, "generally speaking, the Regional Issues Forum would not consider individual policy issues that are currently part of an ongoing stakeholder process..." PacifiCorp agrees that the primary function of the RIF is to facilitate discussions and provide educational or informational content on matters of interest to stakeholders, and believes it may be prudent to conduct RIF discussions on items that are already within a formal ISO stakeholder process. Therefore,

PacifiCorp supports the RIF's proposal not to exclude these discussions, while maintaining that these RIF discussions should not be considered a part of any existing, formal ISO stakeholder process.

### **C. Changes to EIM Governance Charter and RIF Operating Guidelines**

During the February 28, 2017, EIM Governing Body meeting, the ISO stated that its legal counsel would review the outcome of the RIF re-evaluation process to determine whether or not changes to any ISO governing documents, such as the EIM Governance Charter, are necessary, and if so, recommend such revisions. PacifiCorp agrees with this approach and looks forward to the ISO's recommendation. Additionally, as stated above, PacifiCorp believes that the EIM Governance Charter should at least be revised to remove the current RIF re-evaluation language, and such language should be replaced with a provision that allows for the RIF to call for a re-evaluation of the RIF as circumstances may warrant without any predetermined trigger date. PacifiCorp also supports the RIF's recommended revisions to the RIF Operating Guidelines regarding RIF meetings, as set forth in the Issue Paper.

## **III. CONCLUSION**

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