



**Western Energy Imbalance Market Regional Issues Forum Re-evaluation  
Issue Paper  
Public Generating Pool Comments  
May 3, 2017**

The Public Generating Pool (PGP) represents ten consumer-owned utilities in Oregon and Washington, three of which own and operate Balancing Authority Areas (BAA)s. PGP has been a strong supporter of the Regional Issues Forum (RIF) since its inception and appreciates the opportunity to comment on the RIF Reevaluation Issue Paper developed by the RIF liaisons dated March 31, 2017.

**Process and Timeline for Reevaluation**

PGP supports expediting the reevaluation process and recommends that to the extent there is consensus of stakeholder comments received in the first round of public comment due May 3, 2017, the RIF liaisons should focus the second round of revisions and comment period on needed modifications to the EIM RIF Operating Guidelines.

PGP also supports removal of the current reevaluation language from the EIM Governance Charter. PGP does not believe any new language requiring reevaluation by a predetermined date is necessary. Any potential future reevaluations should be called for by the RIF or EIM Governing Body to the extent circumstances warrant such a reevaluation.

The detailed schedule provided in support of completing the RIF reevaluation process by July 13, 2017 appears to be sufficient.

**Possible Changes or Clarifications to RIF Roles and How the RIF Functions**

PGP fully supports the proposed meeting frequency and coordination of the RIF. PGP supports announcement of the RIF meetings via ISO market notice and through the liaisons with *at least* 21 days-notice of the date and location, recognizing that more notice may be needed when RIF meetings align with EIM Governing Body meetings.

PGP is supportive of the recommended process for meeting agendas and content. PGP supports the development of meeting agendas based on stakeholder input and/or requests for discussion by the EIM Governing Body or the EIM Body of State Regulators. Additionally, PGP supports the provision of the agenda two weeks prior to the meeting date and materials no less than one week prior to each meeting to allow meeting participants to determine attendance and sufficiently prepare for the RIF meetings.



**Should the RIF Be Limited to Facilitating Dialogue or Consider Producing Recommendations and Opinions. What Subject Matter Areas Should be the Primary Focus?**

PGP finds the recommendation for the RIF to only produce written opinions and recommendations upon the specific request of the EIM Governing Body to be too limiting. The opportunity for written work products should be expanded to include summaries of stakeholder interests on existing and emerging issues for the benefit of RIF participants and the EIM Governing Body and that the development of such written work products could also be requested by the RIF.

PGP agrees with clarifying the scope of the RIF to provide a forum for open discussion of issues already within a formal stakeholder process to enhance understanding of emerging EIM issues.