



CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS ON THE REGIONAL ISSUES FORUM ENHANCEMENTS PROJECT DISCUSSION PAPER

I. INTRODUCTION

California Community Choice Association¹ (CalCCA) appreciates the opportunity to submit the following comments on the *Regional Issues Forum Enhancements Project Discussion Paper* (Discussion Paper). The Discussion Paper was presented at the Western Energy Markets (WEM) Regional Issues Forum (RIF) on April 9, 2025. As described in the comments herein, CalCCA supports with caveats the Discussion Paper's proposal to transition the RIF into the Stakeholder Representatives Committee (SRC) proposed in the West Wide Governance Pathways Initiative Step 2 Final Proposal.² The SRC was developed with significant input from stakeholders across the West. The result is a proposal that adopts best practices of stakeholder processes, defines sectors reflective of the current breadth of participating stakeholders, and expands the role of stakeholders in market design initiatives.

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance of Southern California, CleanPowerSF, Desert Community Energy, Energy For Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

² Step 2 Final Proposal (Nov. 15, 2024): <https://www.westernenergyboard.org/wp-content/uploads/Pathways-Initiative-Step-2-Final-Proposal.pdf>.

The transition to the SRC will require the RIF and the SRC to function in parallel for a period of time. To ensure stakeholders are best prepared for the transition, the RIF should mirror as many aspects of the SRC as possible during the period when the RIF and SRC are functioning in parallel. Mirroring the RIF sectors with the SRC sectors is critical to this transition, given the expanded role stakeholders and their sectors will play in the stakeholder process under the SRC.

In summary, the comments herein recommend that the RIF:

- Begin a cultural shift towards SRC functions, processes, and sectors by adopting aspects of the SRC to prepare participants for an eventual transition from the RIF to the SRC;
- Transition its sectors to those defined in the Pathways Step 2 Final Proposal as soon as possible to better represent new groups of stakeholders that will participate in the California Independent System Operator (CAISO) and Regional Organization (RO) stakeholder processes, especially if the RIF takes on a greater role in the CAISO's stakeholder process through initiative sponsorship, indicative voting, or active advising of the WEM Governing Body and CAISO;
- Continue its role within the CAISO's Annual Policy Initiatives Catalog and Roadmap Process and encourage the CAISO to administer an Annual Policy Initiatives Catalog and Roadmap Process that mirrors the SRC process to the extent possible;
- Adopt the role of sector sponsors within the stakeholder initiative process to promote stakeholder engagement, facilitate initiative progression, and ensure all stakeholder voices are heard and considered, including minority and majority perspectives, with modifications to the sector definitions to mirror those adopted in the Step 2 Final Proposal;
- Adopt indicative voting at the individual stakeholder level during the Policy Roadmap Process and at key junctures during the CAISO working group and initiative processes; and
- Discuss with stakeholders how to formalize a process for the RIF providing more substantive input to the WEM Governing Body on defined topics as the RIF takes on a broader role within the stakeholder initiative process.

II. SRC TRANSITION APPROACH AND PROCESS

1. Please state your organizations support for the proposal to transition the RIF into the SRC.

- **Support**
- Support with caveats
- Oppose
- Oppose with caveats
- Neutral

CalCCA supports transitioning the RIF into the SRC. To effectuate this transition, the RIF should immediately begin adopting and implementing aspects of the SRC.

The RIF and SRC will likely need to run in parallel for a period of time. The SRC nominating committee will need to be established by the end of 2025 to seat the RO board to support RO launch, which is planned for January 1, 2028. The CAISO will continue to operate the Western Energy Imbalance Market (WEIM) and Extended Day-Ahead Market (EDAM) until the RO launches in 2028. During this time between when the RO board is seated and RO launch, the RIF should continue to function while the CAISO continues to operate WEIM and EDAM.

While the RIF and SRC are functioning in parallel, the RIF should begin a cultural shift towards SRC functions, processes, and sectors. RIF adoption of aspects of the SRC as much as possible and as soon as possible will prepare participants for an eventual transition from the RIF to the SRC.

2. Please comment on the proposal for the RIF to transition into the SRC under the Pathways Step 2 Final Proposal.

See response in section II.1.

III. PROCESS AND TIMING FOR POTENTIAL REVISIONS TO SECTORS

3. Please state your organization’s support for the proposal to establish and reorganize the sectors of the RIF on a transitional basis to align with the sectors of the SRC.

- Support
- **Support with caveats**
- Oppose
- Oppose with caveats
- Neutral

CalCCA supports with caveats the proposal to establish and reorganize the sectors of the RIF on a transitional basis to align with the sectors of the SRC. While the transitional approach proposed in the Discussion Paper could improve the RIF sectors in the interim, the RIF should transition its sectors to those defined in the Pathways Step 2 Final Proposal as soon as possible.

The Discussion Paper proposes to adopt a transition period with two “interim or adjacent” sectors for “Large Commercial/Industrial Customers” and “Distributed Energy Resources.”³ In addition to the formation of these new sectors, the proposal would include changes to existing sectors. With respect to CCAs, the Discussion Paper states:

under the Step 2 Final Proposal, [CCAs] appear to fit within the “Non-IOU load serving entities serving load from WEIM or EDAM” sector. Although they do not generally own or operate transmission or distribution assets as utilities typically do, given the potential alignment of interests between CCAs and the current Consumer-Owned Utilities sector, the RIF intends to include CCAs in the Consumer-Owned Utilities sector.⁴

CalCCA supports this as an interim approach and has joined the Consumer-Owned Utilities sector. However, the RIF should take immediate steps to fully align the RIF sectors with the

³ Discussion Paper at 7.

⁴ *Id.* at 8.

sectors defined in the Step 2 Final Proposal. As described in section 2, a cultural shift towards SRC sectors will prepare participants for an eventual transition from the RIF to the SRC. In addition, the stakeholder process to develop the SRC sectors revealed that the sectors defined in the Step 2 Final Proposal will better represent new groups of stakeholders that will participate in CAISO and RO stakeholder processes.

RIF sector alignment with the SRC is especially necessary if the RIF takes on a greater role in the CAISO's stakeholder process through initiative sponsorship, indicative voting, or active advising of the WEM Governing Body and CAISO, as described below. Implementing sectors that best reflect the diverse set of stakeholders participating will ensure all stakeholders are equitably represented and can fully engage in these new functions.

- 4. Please comment on the Paper's discussion of transitioning the current sectors of the RIF to the sectors of the SRC. What process and timing issues relating to changes in the sectors, including for the establishment of new sectors, does your organization believe should be addressed by the RIF?**

See response in section III.3.

- 5. Should the RIF implement sector changes on a transitional basis to accommodate the timing needs for the RO Board Nominating Committee under the Step 2 Final Proposal?**

See response in section III.3.

IV. ROLE OF THE RIF AND POTENTIAL CHANGES TO ALIGN WITH THE STAKEHOLDER REPRESENTATIVES COMMITTEE

- 6. Please comment on the role of the RIF within the CAISO's Annual Policy Initiatives Catalog and Roadmap Process. Although the role of the RIF within the current process is similar to the envisioned role for the SRC within the RO policy initiative prioritization process, are there additional functions that the RIF should be performing as a part of the Catalog and Roadmap Process?**

The RIF should continue its role within the CAISO's Annual Policy Initiatives Catalog and Roadmap Process. CalCCA agrees that the role of RIF in the current CAISO process and the role of the SRC in the future RO process are similar. Differences generally apply to CAISO/RO-specific procedures within the Annual Policy Initiatives Catalog and Roadmap Process, rather than RIF/SRC-specific procedures, and are addressed in section IV.7, below.

- 7. Should the RIF encourage the CAISO to administer a process whereby stakeholder statements of position or advisory votes (akin to the voting process contemplated for in the Step 2 Final Proposal) are solicited on the final Catalog/Roadmap documents?**

The RIF should encourage the CAISO to administer a process that mirrors the SRC process to the extent possible. The Discussion Paper states that the role of RIF in the current CAISO Annual Policy Initiatives Catalog and Roadmap Process resembles the role of the SRC in the future RO Annual Policy Initiatives Catalog and Roadmap Process.⁵ The Discussion Paper, however, identifies three key differences. First, under the current process, CAISO staff generally drives policy prioritization, but under the RO framework, the SRC will coordinate with the RO staff on prioritization. Second, there is no voting under the current process, but stakeholders will vote on the final Policy Initiative Catalog and Roadmap documents within the RO stakeholder

⁵ See Discussion Paper, at 10.

process. Third, while the CAISO Board of Governors and the WEM Governing Body do not vote on the Annual Roadmap Process, the RO Board will approve the final prioritization of initiatives. These differences generally apply to CAISO-specific processes, rather than RIF-specific processes. Therefore, the RIF should encourage the CAISO to adopt these processes to help prepare for the transition to the SRC process upon the implementation of the RO.

8. Please state your organization's support for the proposal to establish the role of sector sponsors within the stakeholder initiative process.

- Support
- **Support with caveats**
- Oppose
- Oppose with caveats
- Neutral

The RIF should adopt the role of sector sponsors within the stakeholder initiative process with modifications to the sector definitions to mirror those adopted in the Step 2 Final Proposal. Establishing the role of sector sponsors within the stakeholder initiative process will promote stakeholder engagement, facilitate initiative progression, and ensure all stakeholder voices are heard and considered, including minority and majority perspectives. To ensure the addition of sector sponsors achieves these objectives, the RIF should seek to modify its sectors to mirror those adopted in the Step 2 Final Proposal. As described in section III.3, above, these modifications will ensure adequate representation of all groups of stakeholders that will participate in CAISO and RO stakeholder processes. These representation improvements are necessary as the RIF begins to take on expanded roles within CAISO stakeholder processes.

9. Please specify any considerations that you believe are relevant to establishing the role of the sector sponsor. Do you agree with how this role has been defined as set forth above?

As described above, sector definitions should be refined to mirror those in the Step 2 Final Proposal to ensure the role of sector sponsors function as intended and represent all stakeholder perspectives. CalCCA agrees the role of sector sponsors should be “focused on facilitating and encouraging comprehensive stakeholder engagement rather than on the advancement of single prescribed outcome for the initiative,” and that the sector sponsor should be “responsible for working toward an outcome that has broad stakeholder support, while also considering minority views.”⁶ Adopting the Step 2 Final Proposal sector definitions will provide necessary assurances that sector sponsors function in this capacity and “mitigate the potential for a sponsor using the role to solely promote their own interests or those of the sector they represent.”⁷

10. Would your organization support the start of indicative voting during CAISO stakeholder processes? At what points during the process should votes be cast, i.e., problem statement development, straw proposal, final proposal, etc.?

CalCCA supports beginning indicative voting during the CAISO stakeholder process with the following recommendations. First, indicative voting should occur during the Policy Roadmap Process and at key junctures during the working group/initiative process, such as problem statements, straw proposal, and final proposal. Second, voting should occur at the individual organization level tallied at the sector level, with the sectors defined in the Step 2 Final Proposal. Finally, votes should be advisory only for the purpose of providing visibility and

⁶ Discussion Paper at 13.

⁷ *Ibid.*

information to the RIF, CAISO staff, the CAISO Board, the WEM Governing Body, and other stakeholders. Indicative voting should not take the place of verbal dialogue and written comments. While indicative voting would provide clarity on general support or opposition to a proposal, stakeholder comments provide the opportunity to document more detailed and nuanced positions and allow stakeholders to articulate the justifications for their votes.

- 11. Does your organization support the RIF exercising a more active role in advising the WEM Governing Body and/or CAISO regarding the positions of stakeholders on initiative topics in a stakeholder process or that are before the Governing Body? Are there procedures that your organization believes the RIF should follow in carrying out this function?**

CalCCA agrees that there could be broad benefit and usefulness to formalizing a process for the RIF providing more substantive input to the WEM Governing Body on defined topics as the RIF takes on a broader role within the stakeholder initiative process. As the RIF begins its transition, it should discuss with stakeholders which elements of the process should be adopted to enable the provision of more substantive feedback to the WEM Governing Body.

- 12. Do you support the RIF taking steps to move away from providing information or educational content during its meetings? Should the RIF move its focus to discussion of issues that are actively pending in stakeholder processes?**

The RIF should continue its informational and educational functions as it adopts SRC functions. The educational role of the RIF has been a valuable component of the stakeholder process by promoting common stakeholder understanding of key market issues. For the reasons described above, the RIF should begin adopting aspects of the SRC design, including discussions of issues in active stakeholder processes, to facilitate a smooth transition from the RIF to the SRC. It would be beneficial for the RIF to continue its informational and educational functions,

and for the SRC to consider also adopting these functions, to enhance the ability for stakeholders to understand and participate in stakeholder processes.

- 13. Please provide input on any other specific proposals that the RIF should consider to support and facilitate stakeholder involvement in the initiative process.**

CalCCA has no comments at this time.

V. OTHER COMMENTS

- 14. Please provide comments regarding the process and timeline for the RIF Enhancements project.**

See response in section II.1.

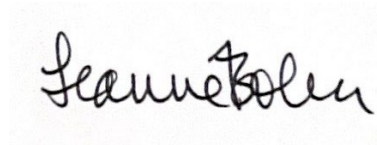
- 15. Please provide comments regarding any other aspect of the RIF Enhancements project.**

CalCCA has no additional comments at this time.

VI. CONCLUSION

CalCCA respectfully submits the above informal comments for consideration of the recommendations herein.

Respectfully submitted,

A handwritten signature in black ink that reads "Leanne Bober". The signature is written in a cursive, flowing style.

Leanne Bober,
Director of Regulatory Affairs and Deputy
General Counsel
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION