

**Regional Issues Forum Enhancements Project  
Discussion Paper  
Submit comments to [EIMRIF@caiso.com](mailto:EIMRIF@caiso.com)**

**Comments of the California Department of Water Resources State Water Project**

**SRC Transition Approach and Process**

1. Please state your organization's support for the proposal to transition the RIF into the SRC:
  - Support
  - Support with caveats
  - Oppose
  - Oppose with caveats
  - Neutral
2. Please comment on the proposal for the RIF to transition into the SRC under the Pathways Step 2 Final Proposal.

The California Department of Water Resources – State Water Project (DWR-SWP) is generally supportive of the Pathways Initiative. However, based on the description of DWR-SWP's operations, we are uncertain where we might fit in the proposed stakeholder process. Although DWR-SWP shares some attributes with certain of the enumerated classes, it remains unique and doesn't appear to fit squarely in any.

As you can see from the narrative below (taken from one of DWR-SWP's Federal Energy Regulatory Commission filings), DWR-SWP is a significant generator, but only as a byproduct of its primary function, the delivery of water, and even then, generates largely to meet its own load. DWR-SWP is a wholesale transmission customer but has no retail load. DWR-SWP is a publicly owned utility, exempt from California Public Utilities Commission jurisdiction, but does not serve retail customers. DWR-SWP is a very sizable load within the CAISO but is not commercial or industrial.

DWR-SWP offers these comments in the hope of confirmation that the unique nature of DWR-SWP's operations can be included as the Pathways Initiative moves forward. Given the sector descriptions in the Discussion Paper, DWR-SWP asserts that it would best fit into the non-IOU LSE sector—DWR-SWP seeks confirmation that it will be able to fully participate in that sector (or another sector that better fits DWR-SWP's unique status).

The California Department of Water Resources is an agency of the State of California, headquartered in Sacramento. It is responsible for monitoring, conserving and developing California's water resources, providing flood protection to ensure public safety, and

preventing property damage related to water resources. A primary responsibility of DWR is the construction, operation, and maintenance of the State Water Project.

The SWP is the largest state-owned, multi-purpose water project in the country. Its operations are critical to the resources and economy of the state. The SWP's system spans nearly the entire state, from Upper Feather River reservoirs and Lake Oroville in Northern California to Pyramid, Castaic, Silverwood and Perris reservoirs in Southern California. The SWP delivers an average of 2.6 million acre-feet of water per year to 29 public agency water contractors throughout California. Approximately 25% of the deliveries are used to irrigate approximately 750,000 acres of farmland. The rest of the deliveries serve the water needs of more than 27 million Californians.

The SWP's water conveyance system includes 29 water storage facilities, approximately 700 miles of aqueducts and pipelines, 21 pumping plants, three pumping-generating plants and five hydroelectric power plants. The SWP's power generating sources have capacity of over 1,500 megawatts and generate 1.5 to 5 million megawatt-hours of energy per year. The SWP's pumping facilities have capacity of almost 3,000 megawatts and consume 2.5 to 9.5 million megawatt-hours of energy per year. In addition to its hydroelectric facilities, the SWP receives power from long-term contracts. Furthermore, the SWP manages its power operation through self-generation, load management including demand response, purchase and sales transactions with other entities, and participation in the California Independent System Operator Corporation ("CAISO") power markets.

### **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
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?
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?

### **Role of the RIF and Potential Changes to align with the Stakeholder Representatives Committee**

#### Role in Policy Initiative Identification and Prioritization (Catalog/Roadmap Processes)

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?

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?

Role in Stakeholder Initiative Phase (Stage 1 Issue Evaluation/Problem Statement and Stage 2 Policy Development)

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
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?
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.?

Function and Purpose of the RIF

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

**Other comments**

14. Please provide comments regarding the process and timeline for the RIF Enhancements project.
15. Please provide comments regarding any other aspect of the RIF Enhancements project.