

**Regional Issues Forum Enhancements Project
Discussion Paper**

Submit comments to EIMRIF@caiso.com

Comments Template

SRC Transition Approach and Process

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

[NV Energy supports the RIF's transition into the SRC that is designed under the Pathways Step 2 Final Proposal with caveats that are further defined in our comments. The RIF could begin positioning itself for its transition into the SRC by adopting the new sectors that are outlined in the Discussion Paper. Other changes should wait until an acceptable version of the SB 540 legislation has been approved. The RIF should: \(1\) maintain its existing Roundtable process for identification and prioritization of initiatives; \(2\) delay any adoption of an initiative sponsor role; and \(3\) maintain its existing advisory process. In addition, the RIF should consider how to approach voting.](#)

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](#)
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?

[The RIF should move forward with the addition of the additional sectors, including any necessary changes to the governing documents such as the Charter for WEIM and EDAM.](#)

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?

Yes, as noted in the Discussion Paper, formation of the new sectors and potential restructuring of others could facilitate the formation of a RO. The Discussion Paper states, “At this time, it appears less critical that sectors expand the number of their sector representatives as part of the transition process than to ensure that stakeholders are appropriately included within a sector.” The question is how will the RIF operate? Will the RIF take votes? If so, sector membership and the relative weighting of sectors negotiated in Pathways could be more significant. NV Energy recommends that the RIF consider the answer to these questions before determining whether to wait to expand the sector representatives.

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?

No additional functions are needed at this time.

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?

No, CAISO has already conducted a survey on the most recent Catalog and Roadmap prior to developing the final Catalog/Roadmap. This survey is very similar to the voting process contemplated for Step 2 Final Proposal. Additionally, the new Catalog/Roadmap process has been receptive to stakeholder feedback and no additional changes are necessary.

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:
 - Oppose
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?

NV Energy opposes the proposal to establish the role of sector sponsors until an acceptable version of SB 540 legislation has been approved. The RIF should not move forward with significant changes to the stakeholder process until the legislation to complete Pathways Step 2 has been approved.

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.?

NV Energy supports CAISO use of indicative voting and argues that CAISO can continue to utilize indicative voting to gain feedback from stakeholders on significant initiatives, similarly to how they have used this functionality in some recent initiatives.

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?

No, the RIF can continue to find areas of alignment and summarize comments if the as it does today. NV Energy is concerned that if the RIF took more of an active role, then some active stakeholder voices may not be appropriately captured. Each stakeholder representative from their respective company is the best suited to communicate their positions within the stakeholder process and finally to the WEM Governing Body. It would take considerable effort among RIF liaisons to accurately communicate specific issues and not lose minority views for every stakeholder within their sector for every stakeholder initiative. Each stakeholder currently has the ability to participate and communicate their companies' perspectives, the RIF should not transition to take on a more active role at this time.

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 wait until other avenues that have been designed under Pathways are set up to take over this educational role before completely abandoning the educational content. The RIF could use the public meetings to set up panels to discuss stakeholder initiative topics along with other educational topics.

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.

The RIF should add an additional criteria that the proposed changes do not delay implementation of EDAM or any fast-tracking of initiatives to address needed year-1 improvements.