

**Regional Issues Forum Enhancements Project
Discussion Paper
Submit comments to EIMRIF@caiso.com**

Comments Template

Pacific Gas & Electric Company (PG&E) appreciates the opportunity to provide comments on the Regional Issues Forum (RIF) Enhancements Project Discussion Paper (RIF Enhancements) and looks forward to continued engagement with the RIF and stakeholders on developing new tools and creating a stakeholder driven culture. Two elements, PG&E believes are critical to success include (1) encouraging the culture change throughout the stakeholder community and (2) having appropriate resources to enable this change. PG&E is supportive of the enhancements identified in the RIF Enhancements, but it is concerned that without the funding and resources necessary to deliver the desired change the task will be a challenge to implement all the outlined enhancements.

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.

PG&E is supportive of the RIF initiating changes that will be needed if the West-Wide Governance Pathways Initiative (WWGPI) Step 2 Final Proposal moves forward in the future. In fact, RIF has begun introducing a few of those concepts already and PG&E encourages RIF to continue to evolve in this direction. WWGPI Step 2 Final Proposal stakeholder work reflects RIFs success to date and its ability to change over time. These steps need to be rolled out with consideration, with support, and in a manner the stakeholder community can manage.

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?

PG&E is supportive of transitioning the current sectors of the RIF to the sectors of the SRC. Identifying the appropriate trigger mechanism and timing will be important. A transition prior to January 1, 2026, seems early and PG&E would encourage using that date or later for an "official" change assuming the current California Legislative approves of SB 540. Pre-work and preparation could initiate within 2025 to ensure we are successful on January 1, 2026, and beyond.

PG&E supports maintaining RIF's current two seats per sector and waiting to transition to the seats identified for Pathways Stakeholder Representatives Committee (SRC). PG&E believes this change should occur when the Regional Organization is operating and ready to transition from the RIF to the SRC.

PG&E encourages the RIF and stakeholders to consider how to support and to enable the new sectors (or divisions from current sectors) including the sector leads to "stand up" a sector, establish process, and assist in getting to a functioning sector as quickly as possible.

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?

PG&E supports targeting accommodating the timing needs for the RO Board Nominating Committee, but is concerned rushing through and under-preparing a sector to deliver effectively is not a good outcome. PG&E believes it is possible to accomplish both within the timing, but it is most important to build sectors that are successful first and foremost.

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 like 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?

PG&E is encouraged by the additional effort from the RIF in the most recent CAISO Catalog/Roadmap Process. Additional collaboration between RIF and CAISO would help stakeholders better understand the challenges, constraints, and opportunities that exist. Management of the overall process should remain with CAISO until the Regional Organization is

operating and ready to transition from the RIF to the SRC. The volume of project management, coordination, and internal assessment needs is beyond the scope and capability of the RIF – as of today. RIF can contribute significantly to change in stakeholder understanding of these issues and collaboration with the CAISO to help expose this in greater detail to the stakeholders.

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?

PG&E supports the use of indicative voting to help stakeholders understand the value and contribution voting can have on the stakeholder process.

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.?

PG&E is supportive of an increased level of RIF engagement in the stakeholder policy initiative process with certain caveats.

- 1) **RIF does have** the ability to access expertise and a broad stakeholder set of input – we should maximize the opportunity to fully utilize these capabilities with the RIF.
- 2) **RIF does not have** funding or resources to enable this change.

PG&E encourages the RIF to use the expertise and exposure to wide, diverse stakeholder input to identify ways to incorporate that into the existing policy initiative process in coordination with CAISO.

- a. *Identify sub-groups with expertise on topics that can contribute to and work alongside CAISO staff to develop solutions – when and where those resources and expertise are available – this is not a requirement, but rather an opportunity to enhance the existing CAISO process with RIF support and engagement.*
- b. *Work with CAISO to develop voting tools and reporting results and help design what could later be utilized by the RO and SRC for the voting process outlined in the Pathways Step 2 Final Proposal.*
- c. *Create forums for stakeholder input to be heard by wider audiences and CAISO, so that stakeholders begin to understand and utilize elements of a stakeholder driven process.*

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?

PG&E does not support, currently, a move to advise the WEM Governing Body or CAISO (including Board) in an official capacity. More time is needed to develop the culture and skill set for this activity to take place.

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?

PG&E does support RIF adding to its core competency provision for discussion of issues actively pending in the stakeholder process alongside CAISO.

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.

PG&E is appreciative of the efforts by the RIF to consider how it develops and aligns with a future laid out in the WWGPI Pathways Step 2 Final Proposal.