

**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:

PacifiCorp supports, with caveats, the transitional measures outlined in the discussion paper. PacifiCorp agrees that some functions the SRC is set to accomplish in the Pathways Step 2 Final Proposal are indeed functions that the RIF is currently undertaking or could potentially undertake. PacifiCorp believes that the scope of these additional items and time commitment required should first be developed and communicated as the additional workload could potentially be cumbersome. Furthermore, PacifiCorp believes the RIF should work closely with the CAISO and the Pathways Launch Committee as it considers transitioning as to not impede enhancements the CAISO is already making to its stakeholder process and to ensure alignment with the Pathways Step 2 proposal.

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

See PacifiCorp's response to prompt 1.

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:

PacifiCorp generally supports the RIF reorganizing to align with the sectors of the SRC.

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?

PacifiCorp generally supports the changes in the sectors due to the varying

stakeholder interests; however, does not view it as a pressing need at this time because of the uncertainties around California SB540.

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?

Similar to PacifiCorp's response in 4, the uncertainties from SB540 give the Company pause on how quickly the RIF should be transitioning into the SRC. Assuming that SB540 is enacted, PacifiCorp supports the RIF reorganizing sectors to support the Nominating Committee process for the Regional Organization (RO) Board.

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?

PacifiCorp believes the role the RIF has taken thus far is sufficient with regards to the CAISO's Annual Policy Initiatives 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?

PacifiCorp believes the survey process created within Catalog/Roadmap process captures consensus from individual stakeholders as the survey allows for ranking of submitted proposals. PacifiCorp does not believe there is a need for the RIF to encourage the CAISO to administer additional processes at this time.

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:

PacifiCorp opposes with caveats. PacifiCorp has concerns with the amount of time and effort it will require to be a sector sponsor, which may lead to a lack of diversity within the pool of individuals who are willing to be sponsors. While sponsors would ideally not promote their own interests in their role, it seems unlikely to PacifiCorp that sponsors could act completely impartially. In PacifiCorp's opinion, the sponsor role is more suited to begin after the SRC is formed because sector representation is

expanded to multiple members, thereby spreading responsibilities over more individuals than what happens today in the RIF. PacifiCorp believes that SRC members will have the ability to act as sponsors, thereby expanding the pool of individuals willing to be sponsors.

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?

PacifiCorp agrees with the goals set out in the discussion paper that references a role for sector sponsors to help the CAISO garner stakeholder consensus on policy topics. However, the work that would be required to uphold regular sub-working group meetings, aligning policy with the overall stakeholder community and minority input is a large task and could be overly burdensome depending on the topic at hand. PacifiCorp believes the CAISO has done a great job adapting their stakeholder process to evolve with the needs of stakeholders which was to create a more robust discussion process prior to moving to the policy initiative phase. Furthermore, as stakeholders continue to evaluate their future participation within EDAM and WEIM, PacifiCorp believes CAISO staff should continue to ultimately facilitate the stakeholder process.

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.?

PacifiCorp generally supports indicative voting and believes it should be used as a means to understand where stakeholders are positioned within an initiative, which could provide insight during the problem statement development phase.

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?

PacifiCorp believes the primary role of the RIF is to educate stakeholders and bring awareness for regional issues. This should continue until there is another organization to take on this role, like the Office of Public Participation envisioned in the Pathways proposal. PacifiCorp does believe there is an opportunity, but not necessarily a need, for the RIF to formalize a process for providing input to the WEM Governing Body on specific topics. Before taking on this new role, PacifiCorp believes the RIF should work with the WEM Governing Body to determine what kind of information members would find useful, the topics they would want information on, and the timing of the information. PacifiCorp has concerns that this process could be overly burdensome for RIF liaisons as it can be challenging to coordinate within a sector to aggregate opinions that then need to be articulated 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?

PacifiCorp does not support the RIF moving away from informational or educational content until there is an organization to fill the responsibility. PacifiCorp believes the RIF is the appropriate venue to foster stakeholder discussions for larger issues discussed within the region.

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

No comment.

Other comments

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

PacifiCorp supports reorganizing sectors on a timeline that can support the Pathways nomination process when passage of SB540 allows for the creation of the RO as envisioned in the Pathways Step 2 proposal. For other proposed enhancements, the RIF should work closely with the CAISO to ensure changes are compatible with enhancements the CAISO is already considering for the stakeholder process.

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

In general, PacifiCorp believes the RIF should coordinate closely with the CAISO on this project. The CAISO has expressed their willingness to improve the stakeholder process and has actively demonstrated those improvements through the creation of working group/sub-working group meetings which has shown to receive more engagement and fostered additional discussion. For enhancements like indicative voting and the sponsor role, PacifiCorp views this project as a means of aggregating stakeholder feedback so that the RIF can make recommendations to the CAISO, rather than the RIF forcing changes on the CAISO. For expanding the role of the RIF, PacifiCorp believes the RIF should consider whether enhancements can be supported by RIF liaisons who volunteer for these roles. It's not clear to PacifiCorp that RIF liaisons have the capacity to expand beyond their roles providing information to their sectors to that of a facilitator.