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:
   - <mark>Support</mark>
   - 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.
   - Shell agrees that the RIF should prepare to transition to the SRC as envisioned under Step 2 of the Pathways proposal and appreciates the level of effort being put into this proactive approach. Shell is aligned at a high level with the approach and process laid out in the discussion paper.

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
   - <mark>Support with caveats</mark>
   - 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?
   - Shell supports aligning the RIF sectors with the proposed SRC sectors on a transitional basis to support an orderly governance change. Alignment of sector definitions will synchronize the RIF structure with that of the SRC. Additionally, given that the RO Nominating Committee (NC) will be composed of 11 members (with 1 member from each sector), having all of the sectors fully formed with at least one liaison for each sector will ensure that the RIF is well situated to transition to the SRC and that the SRC

is geared up for representation in the nominating committee. It will be important, as part of the sector reorganization process, to actively seek feedback from entities and assess sector size and voting balance.

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?
   - While sector reorganization must be handled carefully, Shell believes that the sooner this process is initiated, the better, as these changes will be necessary to develop processes and protocols to facilitate the NC formation. Shell is supportive of setting a Q4.2025 or Q1.2026 target.

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?
   - The SRC will take on a more formal role in the policy initiatives catalog/roadmap process as envisioned under the RO. Given this, there may be an opportunity for the RIF to consider integrating a process that involves reviewing/assessing/organizing sector submittals.
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?
   - Yes

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
   - <mark>Support with caveats</mark>
   - 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?
   - Shell generally agrees with how the role of sector sponsors has been defined and believes that this position will add great value to the sectors in regard to organization, coordination and engagement. Given that the sponsor will act as an advisor to the RO staff, it is important that there is transparency in this process. Recommendation to require any guidance provided to the RO staff be reported back to the sector. This

promotes transparency, accountability and acts as a form of feedback – enabling sector stakeholders to track what suggestions are incorporated into the final policy proposal. While the Step 2 proposal outlines 1 or 2 sponsors per sector, it may be beneficial to require an alternate if a sector only nominates one sponsor.

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.?

    - Yes. Shell is in strong support of starting indicative voting as this adds a layer of transparency and allows the development of and tracking of metrics through the policy process. Further, indicative voting will provide granular insight (sector level, policy section etc.) that can be used to promote feedback or identify significant opposition. Shell recommends that this function be leveraged for draft and final proposals and implemented in a similar fashion to comment submittal (wherein voting dates are published on the calendar and entities submit votes through a portal, as opposed to live on a stakeholder call).

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?

    - Yes, Shell is supportive of the RIF taking a more active role in advising the WEM GB. While the options in the discussion paper are promising, there is some level of concern that option 1. 'Assign sub-teams of SMEs to evaluate proposals...' as this may represent a significant amount of work for these groups and may result in groupthink/bias/dependency during the ingestion and position forming stage of a policy process. Regarding option 2. 'Produce documents or opinions...' Shell believes this is a great opportunity to consolidate submitted stakeholder comments in search for points of alignment or opposition. This is more of an administrative task that all stakeholders and the WEM governing body may benefit from.

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?

    - Strongly support. While education is important for level setting, Shell believes that there would be much more value in using the RIFs time to focus on problem identification, debating policy options and sharing feedback/opinions/thoughts amongst stakeholders.

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.

    - Suggestion to align the decision-making process with the Pathways Legislative schedule. Incorporate a checkpoint in Q4.2025 after the Legislative session.

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