

**Regional Issues Forum Enhancements Project  
Discussion Paper**

**Submit comments to [EIMRIF@caiso.com](mailto: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**
    - 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.
  - **PGE supports the timing of this transition in anticipation of the approval of Pathways Step 2**

**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?
  - **PGE supports the transitional approach prior to formal SRC establishment, including interim representation for the specified sectors (Large Commercial/Industrial Customers and the Distributed Energy Resource sectors)**
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?

- **PGE supports implementing sector changes on a transitional basis, as this provides necessary flexibility given the uncertain timing of the Pathways Step 2 governance process.**

## **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?
  - **PGE appreciates the current role of the RIF in the policy roadmap process and that while important, the scope of the RIF's role does not need to be prioritized above other stakeholder participation improvements.**
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?
  - **PGE does not believe that this should be a priority right now given potential challenges in reaching agreement as entities evolve their market participation.**

### 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?
  - **PGE believes the responsibilities of the sector sponsor are appropriate and will encourage active participation and consideration of diverse stakeholder perspectives in the initiative 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.?
  - **PGE is open to indicative voting during CAISO stakeholder processes. If such voting is implemented as part of the SRC, PGE believes votes could be most useful at some point between the straw proposal and final proposal, although PGE asks for additional stakeholder input on this design choice. PGE believes**

**that CAISO's current approach that asks stakeholders to indicate "support, neutral, oppose" is a form of inductive voting.**

#### 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?
  - **PGE generally supports an active role for the RIF in advising other governing entities as means to grow understanding of participant priorities. However, PGE can foresee difficulty in an advisory role in instances where RIF/SRC participants do not have a unified position(s). PGE believes that the continued "direct engagement" approach, where each market participant is able to directly engage with CAISO on stakeholder process evolution should continue to be the primary method of engagement.**
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?
  - **PGE values the RIF's educational presentations as a useful level set for meeting participants. Conducting an open, public review of initiatives reduces chances of misinterpretation and can open opportunities for collaboration.**
  - **PGE supports the RIF taking a measured, deliberate approach when addressing current initiatives during RIF meetings. Specifically, the RIF should avoid creating a parallel or shadow stakeholder process. However, the RIF should look for opportunities that enable deeper stakeholder participation in a particular topic, or provide additional context or examples of how other regions are approaching a market enhancement.**
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 additional comment from PGE.**

#### **Other comments**

14. Please provide comments regarding the process and timeline for the RIF Enhancements project.
  - **PGE believes that this project is well-timed in tandem with other governance design changes in progress.**
15. Please provide comments regarding any other aspect of the RIF Enhancements project.
  - **N/A**