Regional Issues Forum Enhancement Project Draft Final Proposal

November 7, 2025

Executive Summary

In November 2024, the West-Wide Governance Pathways Initiative ("Pathways") Launch Committee issued a proposal ("Step 2 Final Proposal") to evolve the governance over the Western Energy Markets ("WEM") administered by the California Independent System Operator Corporation ("CAISO"). The stakeholder process components of that proposal described a Stakeholder Representatives Committee ("SRC"), similar to today's WEM Regional Issues Forum ("RIF"), although with an expanded role for the SRC in the markets' stakeholder process.

This paper outlines a proposed RIF evolution to enhance, in the near-term, the RIF's involvement in CAISO stakeholder processes and to begin the transition to the SRC. One important consideration in connection with this proposed evolution is that the RIF is an independent body that does not report to CAISO. The RIF liaisons believe these proposed changes are within the purview of the RIF to undertake. However, some of the recommendations made in this proposal are within the scope of the CAISO-run stakeholder process and will require support from the WEM Governing Body and, in some areas, CAISO staff to effectuate the change. The RIF liaisons are recommending a transition of the stakeholder process toward the structure envisioned under the Pathways initiative, ahead of the full implementation of the Regional Organization ("RO") Board and the SRC. A set of incremental steps are proposed to be undertaken by the RIF liaisons and CAISO staff in the near term that would be beneficial regardless of the SRC development timeline.

Looking ahead to the transition to the SRC, the RIF liaisons anticipate informally identifying representatives for the two new sectors created for the SRC in the coming years to facilitate their involvement with the establishment of the SRC, with the goal of aligning all members and liaisons with the new RO governance body prior to its formal establishment. This proposed transition to the SRC is intended to streamline stakeholder engagement and avoid the inefficiencies of maintaining two parallel bodies. The RIF liaisons view this approach as a way to reduce duplicative efforts and optimize stakeholder time and resources.

¹ See West-Wide Governance Pathways Initiative, Launch Committee, Step 2 Final Proposal (Nov. 15, 2024), available at https://www.westernenergyboard.org/wp-content/uploads/Pathways-Initiative-Step-2-Final-Proposal.pdf.

To proceed, this proposal would require endorsement from the Pathways representatives followed by approval from the WEM Governing Body. The RIF believes that once the SRC is fully established, the current RIF stakeholder body may be dissolved.

This Draft Final Proposal examines some of the proposed roles for the SRC and considers whether and how to begin to implement those changes in the RIF. Adopting these changes could provide benefits by both enhancing the operation of the RIF in the near term and preparing the RIF to transition to the SRC. The proposal considers changes in the following areas:

- 1) SRC Transition Approach and Process The paper proposes for the RIF to adopt changes that will facilitate a smooth transition into the SRC. The RIF liaisons will work with Pathways representatives to develop a plan to transition when the relevant criteria for implementation of the RO under the Pathways Step 2 Final Proposal are satisfied that both the RIF and the Pathways can endorse.
- 2) Process and Timing for Potential Revisions to Sectors The RIF liaisons propose to informally identify representatives for the additional SRC sectors to prepare them for SRC engagement but not to create new RIF sectors at this time. Additionally, the RIF liaisons will communicate changes to current members that will be moving into new sectors under the SRC during the transition process.
- **3)** Role of the RIF and Proposed Changes— The RIF liaisons propose changes in certain areas to align with the anticipated roles of the SRC. These are items that the RIF liaisons believe would be beneficial to the WEM Governing Body and the CAISO stakeholder process regardless of the proposed RIF evolution process to the SRC:
 - a. Role in Policy Initiative Identification and Prioritization (Catalog/Roadmap Processes)
 - b. Sector Sponsors in Stakeholder Initiatives
 - c. Indicative Voting
 - d. Function and Purpose of the RIF

The RIF seeks stakeholder feedback on this Draft Final Proposal by November 26th. A stakeholder comment template is included as Attachment A at the end of this paper.

I. Introduction and Background

In November 2024, the Pathways Launch Committee issued the Step 2 Final Proposal to evolve the governance of the WEM, including the Western Energy Imbalance Market ("WEIM") and the Extended Day Ahead Market ("EDAM"), administered by CAISO. The Step 2 Final Proposal

discusses and adopts a range of recommendations related to implementation of the new RO, including several pertaining to the stakeholder process. Passage of Assembly Bill 825 in California in September 2025 means that many of the changes envisioned in the Step 2 Final Proposal can move forward. While the recommendations related to the stakeholder process did not require legislative changes to enact, the legislation provides a level of certainty that the stakeholder process envisioned under the Step 2 Final Proposal will be pursued in conjunction with the formation of the RO.

This Draft Final Proposal outlines changes that can be implemented to enhance CAISO stakeholder engagement through the RIF prior to the launch of the SRC and discusses proposals in the Pathways Step 2 Final Proposal related to the stakeholder process as if the RIF will transition into the SRC. For the near term enhancements, the RIF liaisons are proposing to focus potential efforts primarily on areas that would require only limited or no modifications to the existing Charter for WEIM and EDAM Governance.² In developing this proposal, RIF liaisons prioritized consistency with the direction provided in the Step 2 Final Proposal, alignment with CAISO staff's stakeholder process efforts and focus on the areas of greatest benefit to the broader stakeholder community. The RIF liaisons are thus asking for feedback from stakeholders on whether the proposal below achieves those objectives.

II. Overview of Work Plan

In January, the RIF liaisons developed a Work Plan to address and consider the areas of potential impact and alignment between the SRC in the Step 2 Final Proposal and what the RIF is doing or is authorized to do today. The Work Plan identifies major steps and deliverables in this RIF Enhancements effort and discusses key criteria for advancing changes to the RIF's existing structure and responsibilities. At this stage, the project is focused on the following objectives:

- Identifying and assessing any additional changes to the RIF's role in the CAISO stakeholder process that should be pursued in the near-term, ensuring that these are consistent with the future state of the stakeholder process as envisioned in Pathways
- Incorporating feedback from stakeholders, the CAISO, Pathways, and the WEM Governing Body into explicit proposals for enhancing the RIF

The RIF is coordinating its efforts with parties that are expected to be affected by the changes that are under consideration in this effort, including members of the RIF (*i.e.*, stakeholders within the WEM); the Pathways Launch Committee, Formation Committee, and Stakeholder Process Working Group; and the CAISO. In addition, the RIF will continue to ensure that the WEM Governing Body and the Body of State Regulators are kept apprised of the status of and the issues being considered in this initiative.

² Charter for Western Energy Markets Governance, Board Policy, Ver. 1.7 (Rev. 7.17.2024) ("WEM Charter"), available at <u>Microsoft Word - Charterfor WEIMandEDAMGovernance (Clean as revised effective 07 17 2024)</u>. The provisions of the WEM Charter addressing the RIF are at section 7.

The RIF liaisons have identified the following target timeline for next steps of the activities in this initiative:

November

- Receive comments back from stakeholders on this Draft Final Proposal no later than November 26th.
- Further collaboration with CAISO staff and Pathways to ensure RIF Enhancements are feasible and aligned with Pathways Step 2

Winter 2025-2026

- Determine next steps toward drafting a Final Proposal
- Work with Pathways to develop a transition plan that both Pathways and the RIF liaisons can endorse

In terms of the criteria that should be used for evaluating potential changes, the RIF liaisons propose that changes to the RIF under consideration at this time should:

- Not require the creation of the RO Board to be implemented
- Require limited modifications to the existing Charter for WEIM and EDAM Governance
- Be consistent with the direction and SRC sectors proposed by the Pathways Launch Committee
- Be consistent with the stakeholder process enhancements being pursued by CAISO staff and place limited additional workload on RIF liaisons
- Provide benefits to the RIF stakeholder community through additional transparency, representation, or increased stakeholder engagement
- Prioritize the areas of greatest benefit to the broader RIF community
- Be supported or not opposed by participating stakeholders

The RIF seeks comment on the process, timing, and applicable criteria for potential enhancements.

III. Discussion and Proposals

A. SRC Transition Approach and Process

As outlined in the Step 2 Final Proposal, Pathways envisions a more robust role for the SRC within RO stakeholder proceedings than is currently undertaken by the RIF. Recognizing that the RIF could facilitate its transition to the SRC structure described in the Step 2 Final Proposal, the RIF liaisons propose to closely collaborate with representatives of Pathways to evaluate the feasibility of and to develop and implement processes that will transition the RIF into the SRC

when the relevant criteria for implementation of the RO under the Pathways Step 2 Final Proposal are satisfied. The RIF liaisons believe this transition would both be achievable and represent efficient use of stakeholder resources, provided that the RIF and Pathways can work together to identify a transition process that would align with the current responsibilities of the RIF under the WEM Charter and be consistent with the process, timeline, and objectives for RO formation under the Step 2 Final Proposal.

The RIF liaisons propose to move forward with working with Pathways representatives to establish a transition process to evolve the RIF into the SRC. Pending formal establishment of the SRC, the RIF will continue to function as the RIF, but the RIF may, through revision to its Operating Guidelines and/or its organizational and structural practices, adopt elements of the SRC and the Step 2 Final Proposal consistent with any future transition plan. To proceed with a transition, this proposal would require endorsement from the Pathways representatives followed by approval from the WEM Governing Body. The RIF believes that once the SRC is fully established, the current RIF stakeholder body may be dissolved.

B. Process and Timing for Potential Revisions to Sectors

A key step in evolving the RIF to the SRC structure relates to the current sectors of the RIF and consideration of a transition process from the current RIF sectors to the sectors in Pathways. As discussed in the Discussion Paper, the Step 2 Final Proposal includes a sector structure and representation that is different from the current RIF sectors.³ The Discussion Paper questioned whether and when the sectors of the RIF should be revised to reflect the sector structure in the Step 2 Final Proposal and asked the stakeholder community to comment on the timing for this evolution.

After feedback from stakeholders, the RIF liaisons propose that it begin to identify representatives for the additional SRC sectors to prepare them for SRC engagement but not to create new RIF sectors at this time. This approach would start the formation process for the new sectors, which would involve, at a minimum, identification of relevant sector participants and establishing initial practices for sector activities once those sectors are formalized as part of the SRC. Similarly, for current RIF sectors that include members that are expected to transition to new sectors under the SRC structure, the RIF would propose to ensure that sector liaisons are communicating with sector members regarding future changes and facilitating any needed coordination with Pathways representatives to ensure future changes are understood by impacted members of the stakeholder community. The RIF liaisons proposed that the process and timing for implementing new sectors and transitioning current RIF members to different

³ Please refer to the Discussion Paper at pages 6 through 8 for an overview and analysis of the revised sectors of the SRC as compared with the RIF sectors.

sectors occur as a part of the potential RIF-to-SRC transition process that is described above in section III.A.

Finally, one stakeholder proposed that the RIF undertake a periodic review of the sectors to determine if any changes are needed. However, given that the SRC will begin operation in the next several years, the RIF liaisons recommend that any proposed changes to the RIF sectors should be communicated to the Pathways representatives. The RIF liaisons intend to informally review sectors when issues arise and are communicated to the RIF liaisons, but these changes ultimately should be made under the newly formed SRC.

C. Role in Policy Initiatives Catalog and Roadmap

While the RIF currently has a function within the CAISO Annual Roadmap Process as described below, the RIF does not have a defined role within the stakeholder process for formulating problem statements for CAISO initiatives. It is solely the responsibility of the CAISO staff to conduct working groups, solicit feedback, and aggregate stakeholder positions to determine problem statements that are reflective of the issues stakeholders have identified. The main method for stakeholders to provide input into the process is during meetings and in formal comment periods. Sometimes, CAISO staff develop problem statements without input from stakeholders if there are discrete issues that CAISO staff identifies in the CAISO's capacity as the market operator. CAISO staff may use discussions from public RIF meetings to help inform their problem statement development process, but this is up to the discretion of CAISO staff. The problem statement process concludes when CAISO staff determines that it has enough information to develop and release Issue Papers to stakeholders. Issue Papers set the foundation for policy development by providing stakeholders with the problem statements and overview of the discussions and feedback that led to their development.

Like the problem statement formulation process, RIF liaisons do not currently have a formal role in developing policy. CAISO staff plan, host, present at stakeholder meetings, and invite stakeholders to present policy positions and proposals. The CAISO develops straw and draft proposals based on stakeholder feedback, primarily through written comments and comments in public meetings. The CAISO has also occasionally used polling and advisory voting to help inform staff on the direction of policy discussions. After the CAISO and stakeholders refine enhancements through draft final proposals, a final proposal is presented to the CAISO Board of Governors and/or WEM Governing body for approval. RIF liaisons can express common positions among their sectors to the WEM Governing Body, although this authority of the RIF has been infrequently exercised.

The RIF is assessing if there are aspects of the Pathways Step 2 Final Proposal that would be beneficial for the RIF to implement prior completion of the Pathways process. The discussion

below focuses on several areas of the SRC's expected involvement in the RO stakeholder process and considers if the RIF should adopt or implement any of these elements.

The CAISO staff currently undertakes a comprehensive annual policy initiative identification and prioritization process that is generally conducted as a stakeholder initiative and provides several opportunities for direct stakeholder engagement.⁴ Referred to as the "Annual Roadmap Process," this initiative begins with a level-setting workshop in the first quarter of each year together with an open comment period during which stakeholders may propose policy initiatives for inclusion in the CAISO Policy Initiatives Catalog and in the next iteration of the annual Roadmap. The process culminates with the issuance of a final Policy Initiatives Roadmap in December. Key steps within this process, as defined by the CAISO, include:⁵

Catalog and Roadmap Timeline The Policy Initiative Catalog and Roadmap development process takes place on an annual basis as described above. The following table summarizes milestones during this process:

January	•Level-setting stakeholder workshop
February	•Stakeholders submit policy initiatives to Catalog
March-April	•Stakeholders prioritization workshops
Мау	Stakeholders submit prioritization rankings
June	•ISO releases Policy Initiatives Catalog
July	•ISO begins Policy Initiatives Roadmap development
October-November	•ISO releases Draft Policy Initiatives Roadmap
December	ISO presents Final Policy Initiatives Roadmap to Board of Governors/WEM Governing Body

Stakeholders actively participate in this process by submitting policy initiatives, engaging in prioritization workshops, and providing rankings that influence which proposed initiatives advance to implementation through inclusion in the Roadmap.

To prioritize initiatives, the RIF understands that the CAISO staff engages in an internal assessment process that involves consideration and weighing of multiple factors, including stakeholder priorities and rankings, alignment with CAISO strategic objectives, initiative feasibility, issue urgency, and available CAISO and stakeholder resources. The RIF provides a key input into in this process, with sector liaisons collaborating with their respective sectors to develop and present sector positions regarding new initiatives and proposals for ranking and

⁴ Information regarding the Annual Policy Initiatives Roadmap Process for 2025 is provided on the CAISO website at California ISO - Annual policy initiatives roadmap process - 2025.

⁵ See Cal. Indep. Sys. Operator Corp., Policy Initiatives Catalog and Roadmap Process (Oct. 11, 2024) ("2025 Policy Initiatives Paper") at 5, available at https://stakeholdercenter.caiso.com/InitiativeDocuments/Policy-Initiative-Catalog-and-Roadmap-Process.pdf.

prioritization of initiatives during an annual "Roundtable." The RIF Roundtable will typically take place during the March/April timeframe to allow consideration of RIF input as the Catalog is developed, and it concludes with issuance of a report on the annual Roundtable process. The most recent Roadmap was published on December 12, 2024, and reflects the CAISO's intended plan for existing and new policy initiatives for 2025 through 2027.

The Step 2 Final Proposal specifies that the SRC will assist in identification of discretionary issues through roundtable processes, work with staff on initiative prioritization, and provide formal reports to the RO Board—representing a substantial evolution from current RIF functions⁷. Stakeholder feedback from the RIF Enhancement process revealed broad support for transitioning toward these enhanced functions. However, stakeholders also raised legitimate concerns about resource constraints, implementation timing, and the scope of expanded responsibilities for volunteer liaisons⁸.

The RIF will expand from its current limited role to actively assist in identifying discretionary issues for inclusion in CAISO's Policy Initiatives Catalog, mirroring the future SRC function. This enhanced role will include reviewing, assessing, and organizing sector submittals through a structured roundtable process that produces formal reports identifying stakeholder prioritization.

Specifically, the RIF liaisons propose:

- Development of annual roundtable processes where RIF representatives obtain sector-level input on discretionary initiative priorities, which aligns with current practice.
- Production of a new formal report or work products that provide direct input to CAISO's
 Catalog and Roadmap processes. This work product will be provided to CAISO along with
 the stakeholder input on the policy catalog.
- Structured review and advisory role on proposed disposition of stakeholder submittals, including working with CAISO staff after stakeholder voting to develop the final Roadmap.

This approach aligns with the Step 2 Final Proposal's vision while working within current CAISO processes and volunteer liaison structures.

⁶ See Annual Policy Initiatives Roadmap Process – 2024, available at <u>California ISO - Annual policy initiatives</u> roadmap process - 2024.

⁷ *Id.* at 99-101 (describing SRC role in Catalog process including roundtable processes, voting on Roadmap, and reporting to RO Board).

^{8 4} RIF Enhancements Workshop (June 17, 2025), Slide 48 (identifying "support for indicative/advisory voting" as area of agreement and "timing and priority concern with indicative voting" as area of disagreement).

⁹ Step 2 Final Proposal, supra note 1, at 99 ("The SRC should assist in identification of discretionary issues for inclusion in the Catalog. This can occur through a roundtable-type process, where SRC representatives review, assess, and organize submittals by their sectors").

Recognizing broad stakeholder support for indicative voting, the RIF liaisons propose to implement voting on final Catalog and Roadmap documents, transitioning toward the formal voting responsibilities outlined for the SRC.¹⁰ This proposal enables the transition identified between the current CAISO processes (stakeholder survey response) and the future RO framework (stakeholder voting on final documents).¹¹ The RIF liaisons are proposing the following voting structure:

- Sector-level voting coordinated by the RIF liaison and CAISO Staff and coordination with CAISO staff to present the voting results
- Votes to be conducted on draft Catalog and Roadmap documents following stakeholder comment periods
- Integration of voting results into RIF, while working with CAISO staff and presenting results to the WEM Governing Body
- Development of procedures for handling "support with caveats" positions to address complex policy considerations

While some stakeholders questioned the value of indicative voting without formal authority, we believe this transition process provides valuable experience for the eventual SRC implementation while offering immediate benefits in terms of clearer stakeholder input aggregation. Additionally, we believe this will provide valuable feedback to the stakeholder community and Pathway representatives.

Following the Step 2 Final Proposal's emphasis on formalized coordination between the SRC and staff, the RIF will establish structured coordination mechanisms with CAISO staff to ensure RIF input on prioritization decisions and to understand staff capacity and implementation constraints.¹² The RIF liaisons propose the following coordination mechanisms:

- Regular consultation with CAISO staff on Catalog and Roadmap development
- Coordination with CAISO staff on policy road map prioritization decisions and document the rationale for policy prioritization
- Coordination on timing and scope of initiatives based on CAISO capacity
- Establishment of communication protocols for mid-stream prioritization changes

Acknowledging that RIF liaisons are volunteers and stakeholder concerns about expanded workload, this proposal is designed to enhance effectiveness within existing resource constraints.¹³ As the Step 2 Final Proposal notes, it is "difficult to estimate the amount of time

 $^{^{10}}$ Id. at 101 ("The SRC will conduct a vote to recommend approval of the Roadmap").

¹¹ CalCCA Comments on Regional Issues Forum Discussion Paper (May 15, 2025), at 6 (noting "three key differences" including that "there is no voting under the current process, but stakeholders will vote on the final Policy Initiative Catalog and Roadmap documents within the RO stakeholder" process).

¹² Step 2 Final Proposal, supra note 1, at 101 ("There will be a formalized process for coordination between the SRC and staff to ensure that the SRC can understand staff capacity and tradeoffs in developing recommendations for prioritization").

¹³ RIF Enhancements Workshop (June 25, 2025), Slide 14 [use correct slide number] (identifying "resource and capacity concerns" as area of disagreement and asking "What level of engagement is realistic for enhanced RIF

that may be required of SRC representatives," and that the proposed responsibilities represent "additional responsibilities" relative to current RIF functions. ¹⁴ As such, the RIF liaisons propose the following to aid in managing liaison's workload in implementing the proposed improvements:

- Phased implementation beginning with enhanced roundtable processes
- Integration with existing RIF meeting schedules to minimize additional time commitments
- Structured timelines and clear deliverables to make volunteer participation manageable
- Recognition that liaisons volunteer time for this stakeholder-driven process
- Development of efficient processes that provide maximum stakeholder value with minimal administrative burden

The enhanced Catalog and Roadmap process will serve as practical preparation for the eventual SRC transition.

Following the Step 2 Final Proposal's emphasis on SRC reporting to the RO Board, the enhanced RIF will produce formal deliverables that demonstrate value and prepare for future SRC responsibilities¹⁵. The specific deliverables would be:

- Annual prioritization reports documenting sector input (from the voting results) and cross-sector themes
- Regular feedback to CAISO on stakeholder priorities and implementation considerations for catalog and roadmap prioritization
- Periodic reporting to the WEM Governing Body on RIF activities and stakeholder input

While transitioning toward more active policy roles, the RIF will maintain educational functions that directly support informed stakeholder participation in Catalog and Roadmap processes. This balanced approach addresses the ongoing need for stakeholder education while evolving toward the SRC model.

D. Sector Sponsors in Stakeholder Initiatives

In the Step 2 Final Proposal, the Pathways Launch Committee envisioned a formal role for the SRC in the issue evaluation, problem statement formulation, and policy development phases of

roles given broader concerns about resource limitations that appear throughout the comments considering liaisons are volunteers?").

¹⁴ Step 2 Final Proposal, supra note 1, at 87 ("While it is correct that this Proposal includes additional responsibilities, the Proposal's discussion of the SRC role in the stakeholder initiative identification and prioritization process largely aligns with the tasks performed by RIF liaisons currently").

¹⁵ Step 2 Final Proposal, supra note 1, at 102 ("The SRC should provide a report to the RO Board on the process for developing the Catalog and Roadmap").

the RO stakeholder process. The SRC, at its discretion, may identify sector sponsors to partner with CAISO or RO staff to help drive the initiative through the problem statement and policy development phases of an initiative. The purpose of the sponsor is to help facilitate the process and increase engagement from stakeholders. The role of the sponsor is to help ensure the initiative is progressing in a constructive manner, that stakeholder voices (both majority and minority perspectives) are heard and considered, and to facilitate substantive discussions among stakeholders with differing perspectives. The Step 2 Final Proposal is clear that sponsors should advise and provide guidance to the staff, but that staff retains primary responsibility for the administration of the stakeholder process.

In comments from the RIF Enhancements Discussion Paper on the sector role, commenters were generally supportive of the RIF further developing the role. Many agreed that the role requires transparency and that it should not be used for "gatekeeping" the stakeholder initiative process. There were also some viewpoints that highlighted the tension between sponsors acting as purely facilitators versus shaping the policy direction. Some felt that it would be difficult for an individual to agree to a sponsor role if the role did not provide value for that individual's company. Finally, commentors also raised concerns with the amount of time and effort that may be required to act as a sponsor in an initiative. In general, commenters wanted to see the RIF further define the role and provide details on when the RIF would initialize the sponsor role. After seeing feedback from commentors and discussing internally, the RIF also had discussions with the CAISO to gain CAISO staff's perspective on how a sponsor could provide benefit to the stakeholder process. The CAISO is supportive and willing to work with the RIF on further exploring the sponsor role. From the CAISO's perspective, they believed the sponsor could be helpful in driving engagement from stakeholders as the sponsor may be able to have conversations with stakeholders that may not have the bandwidth to be fully engaged in an initiative. The CAISO also believes the sponsor could help facilitate compromise among stakeholders as the sponsor may be able to bridge identified divisions within the stakeholder community.

Based on the RIF's review of comments and discussion with the CAISO, RIF liaisons believe there is worth in piloting the sponsor role in a future CAISO stakeholder initiative. A pilot program will allow collaboration between the RIF, CAISO, and Pathways to further refine and clarify the responsibilities of the role so that it provides value to the stakeholder process. The pilot will also allow the RIF to work closely with the sponsor to ensure the role does not overly burden the sponsor. Lastly, the RIF believes that piloting the sponsor role will allow the RIF and stakeholders to contemplate how the sponsor should be balancing their responsibilities as a representative of their respective company with their role acting as a facilitator of the initiative process.

While details of the sponsor role will be further refined as the RIF, stakeholders, Pathways and the CAISO gain experience through the pilot, the RIF has developed a starting set of guidelines for the role. First, the sponsor is to act in a way that limits their advocacy for their own company's interests while fulfilling their sponsor responsibilities. The sponsor will still be expected to participate in the stakeholder process on behalf of their company as today, but the sponsor will have the additional responsibility of acting as neutral facilitator to drive stakeholder

engagement and help ensure the initiative aligns with stakeholders' goals. Next, the RIF liaisons propose to start with at least two sponsors for piloting the role in a stakeholder initiative. Ideally, the "co-sponsors" would be from different sectors. The purpose of having multiple sponsors to begin with serves multiple purposes. Co-sponsors would be able to share the workload, helping to ensure that sponsors are able to handle the additional time and effort needed to act as a facilitator. Having co-sponsors will also likely make it easier to engage with all stakeholders as co-sponsors are likely to have different sets of individuals they normally engage with. To be clear, the RIF expects that that co-sponsors will work together to ensure that all stakeholders' perspectives are expressed in the initiative. The RIF believes that co-sponsors will be able to leverage their normal networks to ease the process of engaging with stakeholders.

Finally, the co-sponsors will be expected to provide updates to stakeholders and the RIF on their actions. The updates will provide a degree of transparency into the role so that stakeholders understand what input the sponsor is providing the CAISO. The updates will also give stakeholders the opportunity to ask the sponsor questions on the direction the initiative is taking. From the RIF's perspective, the updates will give RIF liaisons valuable insight into how the role is working so that further refinements can be made. As the role will be new for many in the stakeholder community, it is important to the RIF that stakeholders feel like the sponsor is working to improve engagement and shaping the initiative process in a way that benefits everybody. To achieve this, the RIF believes that robust communication between the sponsor, stakeholders, the CAISO, and Pathways is needed. As the pilot program progresses, the RIF, CAISO and Pathways will evaluate what level of communication is useful for stakeholders so that future sector sponsors have clear expectations on how to update the stakeholder community.

In terms of when the RIF would pilot the sponsor role, RIF liaisons will work with CAISO staff to determine a future initiative that would be well suited to test the new role. Ideally, the sponsor role would be piloted in a new initiative rather than one that is currently ongoing. This will give the sponsor, CAISO staff, and RIF liaisons the opportunity to evaluate the effectiveness of the role throughout the entire initiative process. Based on the initiatives proposed in the CAISO's 2025 Policy Initiatives Roadmap, the RIF believes it may be reasonable to pilot the sponsor role in one of the proposed initiatives.

The RIF also contemplated how sponsors would be chosen. While a formalized process for selecting sponsors has benefits, the RIF believes it is best to first focus on how the sponsor role functions to avoid stalling the implementation of the role. There are many details that would need to be resolved to ensure a standard process is equitable to stakeholders. Rather than focus on standardizing a process, the RIF believes it's time and effort would be best spent developing how the sponsor role would function within an initiative. To that end, the RIF liaisons will work within their sectors to find willing sponsors. Sponsors may require support from their affiliated RIF sector to ensure that the sponsor reflects a broad set of sector interests. The RIF will then choose multiple sponsors from different sectors such that the sponsors offer a wide range of perspectives and experience to the role.

The RIF encourages stakeholders to provide any feedback on the sponsor role in comments on the Draft Final Proposal. Specifically, the RIF is looking for feedback on the following:

- Are there any other guidelines the RIF should consider for defining the sponsor role?
- Is there a particular initiative from the 2025 Policy Initiatives Catalog that you believe the RIF should specifically consider for piloting the sponsor role?

E. Indicative Voting

The Pathways Step 2 Final Proposal contemplates the use of indicative voting at certain stages of the stakeholder process. The RIF has considered stakeholder feedback, comments, and discussed the potential use of indicative voting. Following this review, the RIF liaisons propose that CAISO begin implementing basic indicative voting during each comment period in the stakeholder process. Indicative voting would include a comment process. Stakeholders will have the option to decide if they simply provide a vote without comments or also provide comments to explain their vote. The RIF liaisons recommend that CAISO use the type of voting/indication used in the Pathways Step 1 stakeholder process. That process included a question in the public comment template stating, "Please provide a one word reply to indicate whether your organization supports, opposes, or holds a neutral position with respect to the Step 1 Recommendation." However, following stakeholder feedback the RIF liaisons recommend that the CAISO also add in additional voting options to include *support with caveats* and *oppose with caveats*. This will afford stakeholders the opportunity to take a position and indicate that more nuanced comments should be considered.

The indicative voting would also enable more robust reporting of stakeholder and sector positions on an initiative by the RIF to the WEM Governing Body. To be clear, the RIF liaisons propose to report out the indicative voting by sector along with a summary of the stakeholder feedback to indicate nuanced stakeholder positions. The indicative vote is meant to be an addition to the stakeholder process and not a replacement of the current process and reports that are provided by the RIF.

The RIF liaisons are seeking feedback from stakeholders regarding the indicative voting proposal and the preferred method to report the results. There are many different ways voting could be tabulated, such as by sector, by region, generator only, load only, combined generation and load stakeholders, and others. Please note that some of the tabulations may be more challenging to implement than others and this will be considered during the final proposal.

The RIF liaisons encourage stakeholders to provide any feedback on the indicative voting proposal in comments. Specifically, we are looking for feedback on the following:

- The RIF liaisons are proposing aggregating votes by sector. Do you have any additional proposed recommendations that we should consider with this process?
- Which report types would be the most helpful when reporting indicative voting results? Provide any additional indicative voting reports that should be considered.

F. Function and Purpose of the RIF as an Advisory Body to the WEM Governing Body

In the Regional Issues Forum Enhancements Discussion Paper, the RIF liaisons raised the potential of adjusting the function and scope of the RIF so that the RIF may provide more substantive input to the WEM Governing Body for the purposes of decision making. This is a feature of the SRC under the Pathways Step 2 proposal that has historically not been emphasized in the work of the RIF, but has continued to evolve over time; however, the RIF liaisons believe that the RIF could take a more active role in providing input to the WEM Governing Body within the existing Charter for WEIM and EDAM Governance. The RIF liaisons believe that there could be significant benefits to providing additional input to the WEM Governing Body and noted that a more formalized process could be helpful to implement such a change, specifically around how the RIF would identify the topics that it would comment on and how it would distil stakeholder perspectives.

Emphasizing the RIF's role as an aggregator of stakeholder perspectives would represent an addition to the primary function of the RIF today. Historically the RIF's work has been largely centered around educational efforts. After changes to the Charter for WEIM and EDAM Governance based on recommendations from the CAISO Governance Review Committee, the RIF's scope was expanded to allow it to engage on topics that are part of active stakeholder initiatives. Over the past few years, the RIF has begun taking a more active role in discussing active initiatives consistent with this expanded scope. The RIF now provides input to the WEM Governing Body and the CAISO through a "Roundtable" process for informing the CAISO's development of its Annual Policy Initiatives Roadmap as discussed above. In addition, the RIF may: 1) assign sub-teams of subject matter experts to evaluate proposals and report back to the RIF and stakeholders with recommendations for solutions; 2) produce documents or opinions for the benefit of the WEM Governing Body or the CAISO; and 3) communicate RIF-related information and/or perspectives to the WEM Governing Body or the CAISO. The RIF has developed several sets of comments for the WEM Governing Body's consideration, but these comments have been developed on an ad hoc basis and on a limited number of stakeholder issues.

The RIF liaisons sought input from stakeholders on what a more formalized process to develop RIF comments should look like, the desired scope of those comments, and whether the RIF should shift focus from its historical educational efforts. The stakeholder responses to these questions offered a range of feedback that was considered by the RIF liaisons.

In consideration of the comments received, as well as conversations with stakeholders and CAISO staff, the RIF liaisons propose the following:

1) The RIF liaisons will work with stakeholders to develop a more formalized process for developing RIF comments on active stakeholder topics to help inform the WEM Governing Body or RO. This should include establishing guidance for which topics the RIF will provide input on. The capacity of RIF liaisons and stakeholders to participate in additional coordination and meetings among and between sectors will be a significant consideration in developing this process. 2) The RIF will continue to include education as a central purpose of the RIF at least until the Office of Public Participation is established which has been identified under Pathways. Further coordination between the RIF and/or the SRC and the Office of Public Participation is appropriate at a later date to ensure that sufficient educational opportunities are being provided to market stakeholders.

It is important to note that any statements, documents, or opinions provided by the RIF are not intended to supplant individual stakeholder comments and advocacy which will continue to be solicited by CAISO in the stakeholder process. It is expected that stakeholders as individual companies with individual interests make comments in the CAISO stakeholder process. Both RIF and independent stakeholder comments are made available to the WEM Governing Body as part of their decision-making process.

The RIF liaisons look forward to ongoing feedback from the RIF community on this approach.

IV. Conclusion and Next Steps

The RIF would appreciate written input from the stakeholder community regarding the topics and approaches outlined in this paper. A comments template is included as Attachment A. Comments are requested by November 26, 2025, and should be submitted to: EIMRIF@caiso.com.

Following receipt of comments, the RIF liaisons will review the input provided and assess next steps consistent with the timing outlined above in section II. Next steps may include development of further proposal iterations for stakeholders to consider and/or a plan for implementation. Information about upcoming RIF meetings is available on the RIF webpage of the Western Energy Markets website.

The RIF liaisons also encourage members of the RIF to contact their <u>sector liaisons</u> or any RIF officer in the event of any questions or to provide input regarding this initiative.

Attachment A: Comment Template

Near Term Enhancements:

Policy Initiatives Catalog and Roadmap:

- 1. Are there any additional considerations that you would propose to enhance the Catalog and Roadmap process other than those proposed in this draft final proposal?
- 2. Do you support the proposed enhancements to the RIF's involvement in the catalog and roadmap process?

Sector Sponsor Pilot Program:

- 1. Are there other guidelines the RIF should consider for defining the sponsor role?
- 2. Is there a particular initiative from the 2025 Policy Initiatives Catalog that you believe the RIF should consider for piloting the sponsor role?

Indicative Voting:

- 1. Which report types would be the most helpful when reporting the indicative voting results?
 - a. Examples: by region, generator only, load only, combined generation and load stakeholders
- 2. Which report types would be the most helpful when reporting indicative voting results? Provide any additional indicative voting reports that should be considered.

Function and Purpose of the RIF:

Stakeholder perspectives on RIF's role and process for providing comments on behalf of the RIF.

Facilitate Transition of the RIF into SRC:

Are there any additional actions that would be important for the RIF and Pathways to consider in order to effectuate this transition?