

## Comments of the Western Power Trading Forum on EIM Regional Issues Forum Operating Guidelines

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The Western Power Trading Forum (WPTF) is a nonprofit, public benefit corporation. It is a broad-based membership organization dedicated to enhancing competition in Western electric markets while maintaining the current high level of system reliability. WPTF supports development of competitive markets throughout the West and of uniform rules to facilitate transactions among market participants. The membership of WPTF includes energy service providers, scheduling coordinators, generators, power marketers, financial institutions, energy consultants, and public utilities, all of which participate actively in the California market and other such markets in the West and across the country.

WPTF appreciates the ISO moving forward with the recommendation in the Governance Proposal to create a forum for stakeholders to express potential concerns and raise issues related to the EIM. We make the following general comments on the June 13, 2016 draft of the Regional Issues Forum (RIF).

The RIF is an important opportunity for discussing issues that are impacting entities who transact across the markets. Although it is not meant to replace any stakeholder process, it should be a forum to enable members to understand initiatives that affect the EIM and how the initiatives relate to each other. CAISO should give strong consideration to the themes that emerge from the forum – this is a unique stakeholder process where people can look comprehensively at the changes going on in the market and identify problems and solutions. Finally, the forum should be allowed to evolve as the markets and regional governance develops.

WPTF supports the CAISO continuing to refine the draft Operating Guidelines. The guidelines could use some additional review and clarification as they appear to have inconsistent goals and are confusing at different points.