Western Power Trading Forum Comments on EIM Regional Information Forum Reevaluation Discussion

Carrie Bentley, Resero Consulting for Western Power Trading Forum, cbentley@resero.com

February 24, 2017

WPTF appreciates the opportunity to provide responses to the questions posed by the RIF Liaisons to be used to prepare for the upcoming re-evaluation of the RIF. WPTF strongly supports the continuation of the RIF. WPTF also encourages the RIF to continue to coordinate with the EIM Governing Body and provide sufficient flexibility such that the RIF can quickly adapt its processes in order to provide a venue for robust discussions without being required to go through lengthy formal processes. WPTF provides general comments and offers suggestions in two areas of interest to the RIF Liaisons: Stakeholder process for re-evaluation and the future role of the RIF.

Re-evaluation Process

WTPF strongly supports the re-evaluation process to be conducted in an iterative and interactive open forum similar to an ISO stakeholder process. The forum should provide ample opportunity for stakeholders to provide feedback, raise questions, and seek clarity during the re-evaluation process.

Future role of the RIF

WPTF strongly supports continuation of the RIF. The RIF provides regional stakeholders a forum to discuss issues that, in light of the recent pause of regionalization efforts at the ISO, may not be provided elsewhere. Despite this halt of regionalization efforts on the ISO front, regionalization discussions and coordination should continue to take place. Even if the ISO does not expand its BAA regionally, the robust discussions at the RIF meetings continue to inform entities impacted by the EIM or otherwise exchanging energy or services with the ISO at the ISO boundaries.

WPTF supports coordination between the RIF and the EIM Governing Body meetings. Efficient coordination enables RIF discussions to inform decisions being made by the EIM Governing Body and discussions/decisions being made by the EIM Governing Body to inform RIF topics.

The going-forward structure of the RIF should not be extremely prescriptive but rather enable the forum to easily adapt to address topics of interest in a robust manner. For example, it may be reasonable to allow the RIF Liaisons to delegate an upcoming forum to a stakeholder as was done for the Arizona meetings. Regardless of which delegate or group is running the forum, the ISO should continue to provide the infrastructure to conduct such meetings if necessary.

WPTF appreciates the RIF's consideration of these comments.