



February 22, 2017

Submitted via email: EIMRIF@caiso.com

**RE: Comments on the “Western Energy Imbalance Market Regional Issues Forum
Reevaluation, Discussion Draft Prepared by the RIF Liaisons”**

Introduction

Western Resource Advocates (“WRA”) is a non-profit conservation organization dedicated to protecting the land, air and water of the West. WRA’s Clean Energy Program develops and implements policies to reduce the environmental impacts of the electric power industry in the Interior West by advocating for a western electric system that provides affordable and reliable energy, reduces economic risks, and protects the environment through the expanded use of energy efficiency, renewable energy resources, and other clean energy technologies. To this end, WRA has consistently supported enhanced market activity in the Western Interconnection and has been actively engaged in the California Independent System Operator’s (“CAISO” or “ISO”) stakeholder processes related to both the Energy Imbalance Market (“EIM”) and the Regional System Operator (“RSO”).

General Comments

The EIM’s Regional Issues Forum (“RIF”) is critical to the EIM’s overall governance structure and should continue. The RIF’s stakeholder-driven process offers an important opportunity for all stakeholders to engage with CAISO and the EIM Governing Body on issues germane to the successful operation and expansion of the EIM and to provide meaningful input on these issues.

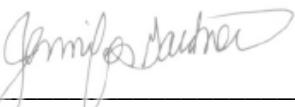
Specific Comments on the “Stakeholder Process Questions”

- (1) In terms of the RIF’s reevaluation process, WRA supports a bottoms-up process that is shaped by stakeholder input. This process should be shaped by stakeholder input whereby EIM RIF liaisons conduct comprehensive outreach to stakeholders and synthesize their feedback into affirmative recommendations.
- (2) Agree.
- (3) WRA believes that the RIF’s reevaluation process is an issue that falls within the EIM Governing Body’s primary authority. As such, the RIF’s final recommendations should be presented to the EIM Governing Body before the EIM Governing Body makes any final recommendations to the CAISO Board of Governors.
- (4) Agree.
- (5) WRA supports the RIF meeting as many times on an annual basis as is necessary for the RIF to accomplish its mission of providing a forum wherein interested stakeholders can express potential concerns regarding the EIM with other stakeholders and with the EIM

Governing Body. Going forward, WRA supports the RIF meetings being held in conjunction with the regularly scheduled meetings of the EIM Governing Body. This will reduce travel costs for interested stakeholders. WRA also recommends that the RIF hold conference calls as necessary in between meetings to ensure that the RIF is prepared to offer final recommendations and/or comments to the EIM Governing Body at the time of their regularly scheduled meetings. Finally, WRA believes it is important for meetings of both the EIM Governing Body and the RIF to continue taking place throughout the Western Interconnection (and not always in California), in order to offer opportunities for all interested stakeholders to engage.

- (6) No additional comments at this time.
- (7) WRA believes that the RIF should strive for written recommendations wherever possible. In particular, any final recommendations made by the RIF to the EIM Governing Body should be in writing. Where consensus positions cannot be reached, majority and minority opinions should be expressed in writing. Where majority and minority opinions cannot be reached, individual sector positions should be expressed in writing. Ultimately, establishing a written record of RIF positions on important EIM issues is not only important for record-keeping purposes, but also for lending a sense of legitimacy to the RIF process and to the RIF's relationship with both its stakeholders and the EIM Governing Body.
- (8) Yes.
- (9) WRA believes that the primary focus of the RIF should be to facilitate regular, constructive and meaningful dialogue between the EIM Governing Body and EIM stakeholders. This aligns with the EIM RIF's Operating Guidelines, which state that the purposes of the RIF is to "provide a forum for stakeholders to learn about the EIM, the EIM Governing Body, and related ISO developments that may be relevant to the RIF, and to provide a forum for addressing broader issues of EIM operations." Additionally, using the RIF to flag important and emerging EIM issues and to facilitate discussion on those issues until they are either resolved or formally included in the CAISO's stakeholder processes is also an important role for the RIF.
- (10) No additional comments at this time.

Respectfully submitted,



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