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Arizona Public Service Company ("APS") submits these comments to the California Independent System Operator Corporation ("CAISO") regarding the EIM Regional Issues Forum ("RIF") draft Operating Guidelines, issued on June 13, 2016 ("Operating Guidelines"). APS generally supports the Operating Guidelines and appreciates the opportunity to provide these comments for consideration.

A. Purpose, Responsibilities, and Composition and Governance

The Operating Guidelines outline the purpose and responsibilities and compensation and governance of the RIF. APS supports these provisions, but provides comment on one aspect concerning the expectation for the development of a common or consensus position among the RIF members.

Under the Purpose and Responsibilities section, item six states the RIF shall: "Establish a process through which it may express a common position on establishing ISO stakeholder processes or to the EIM Governing Body on EIM issues." In addition, under the Meeting Requirements Section 3, item b.ii. indicates that "Action taken by the RIF shall normally be by consensus." APS believes these sections should be revised to add additional clarity that that the RIF is not expected to reach a consensus or agree on EIM policy issues in order for an outcome to be reached on an issue or an issue to be considered by the EIM Governing Body.

B. Notice, Review, and Changes to the Operating Guidelines

The Operating Guidelines also include the provision for the notice, review, and changes to the Operating Guidelines. APS also supports this provision including reconsideration of the efficacy and role of the RIF commencing after 18 months and no later than April 2017 through a stakeholder process in accordance with the EIM Charter.

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APS appreciates the opportunity to provide comments for consideration by the ISO and the RIF members.

Respectfully submitted,

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