



DEPARTMENT OF ENERGY  
Bonneville Power Administration  
P.O. BOX 3621 • PORTLAND, OREGON 97208-3621



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**Regional Issues Forum Reevaluation Comments**

**May 3, 2017**

The Bonneville Power Administration (BPA) appreciates the opportunity to comment on the “Regional Issues Forum Reevaluation Issue Paper” dated March 31, 2017, developed by Regional Issues Forum (RIF) Liaisons. BPA remains convinced that the RIF provides a necessary venue to enable entities impacted by CAISO Energy Imbalance Market (EIM) operations to discuss broad issues and experiences related to the EIM. Further, BPA believes the RIF should continue to regularly bring forth its member stakeholder information to the EIM Governing Body to facilitate its objective, independent assessment of EIM performance over time as contemplated by its charter.

Specifically, BPA is in support of the recommendations advanced in the Issue Paper. BPA also offers the following additional comments for consideration with the intent of promoting regular, deeper discussion within the RIF of issues affecting real-time operations.

1. Process and Timeline for Reevaluation:

The RIF proposes to remove the current reevaluation language from the EIM Governance Charter and replace it with language that allows for either the RIF or the EIM Governing Body to call for a reevaluation of the RIF as circumstances may warrant, at any time in the future, and without any predetermined trigger date. BPA is fully supportive of this proposal, and offers that in the absence of any requested reevaluation, it may be revisited during the September 2020 reevaluation of the EIM Governance as described in Section 2.2.4 in the CAISO Charter for Energy Imbalance Market Governance.

2. RIF Meeting Agendas and Content:

As currently contemplated, RIF meeting agendas will be developed following a solicitation of topics in advance from stakeholders, the EIM Governing Body, or the EIM Body of State Regulators. BPA agrees this is a sound approach to ensure topics of interest to parties are scheduled for discussion. As a complement to this approach, BPA suggests the RIF also establish standing topics for each meeting that seek to bring forth information from the Sector members that describe their experience with the EIM from a broad and specific daily operational perspective. For example, a standing broad agenda item of “Emerging Operational Policies and Issues” may be included to promote a principle-level discussion of topics--followed by a specific member report of how such a policy would impact their daily operational planning and decision-making. The goal of this approach is to yield broader collective insight into the nuances of EIM and ISO’s market policies and practices, and promote knowledge transfer amongst members.

3. Subject Matter Discussed by the RIF:

BPA is in full support of the liaison's reaffirmation that the RIF not consider individual policy issues that are otherwise part of an ongoing CAISO stakeholder process. It further supports the insight made by the RIF that there may, at times, be agenda items that overlap items already within a formal stakeholder process given the many interdependencies of EIM policies and operations. BPA suggest that the RIF not preclude such dialogue, but when such overlap discussions occur, the RIF be in communication with the EIM Governing Body to provide additional understanding and insights that are emerging among sector members.

4. Producing Documentation of Recommendations and Opinions:

BPA is also supportive of the recommendation by the liaisons to produce minutes of RIF meetings to provide a written record of discussions. These minutes will serve to ensure continuity from meeting-to-meeting, as well as provide a reference if discussions at a later date are needed to revisit a particular topic. In addition, BPA concurs that the RIF may produce written documents at the request of the EIM Governing Body; however, BPA also believes that the RIF must preserve the option to produce issue and/or opinion papers—including majority and minority opinions—to either document progress on issues as they mature, or pass on knowledge/information to the EIM Governing Body for their consideration. It would be helpful for the RIF to develop a simple procedure to discern when any such documentation would be appropriate.

Again, BPA appreciates the opportunity to comment.