

## **CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION COMMENTS ON RIF REEVALUATION DISCUSSION DRAFT**

The California Municipal Utilities Association (“CMUA”) appreciates the opportunity to provide initial thoughts on the future role of the Regional Issues Forum (“RIF”). We support the continuation of RIF and changes that may better align its structure and processes with the EIM Governing Body, and to facilitate stakeholder feedback to the Governing Body on EIM-specific matters.

### **Stakeholder Process Questions**

*1. The first question centers around the structure of the reevaluation process. It is the Liaisons’ understanding that the ISO will run a traditional ISO-driven stakeholder process for this effort. The Liaisons would like this to be a bottom-up process shaped by stakeholder input and that is one of the purposes of this initial Discussion Draft. We would benefit from stakeholder feedback on the role of the RIF Liaisons in this process. Should we serve to channel stakeholder feedback? Should we be making affirmative recommendations? Should we go so far as the EIM Transitional Committee to develop comprehensive work products?*

CMUA does not have a strong opinion on whether the process should be led by the ISO or the RIF Liaisons. We do agree that it should be shaped to the maximum extent possible by stakeholders and that seems like an obvious role the Liaisons can play.

*2. The RIF liaisons believe that the RIF reevaluation stakeholder process can be accomplished in a relatively short amount of time and with minimal process. As such, the RIF liaisons recommend that the RIF reevaluation stakeholder process consist of a combined issue paper/straw proposal developed by the RIF liaisons, followed by no more than two stakeholders meeting, and commensurate numbers of iterative comment and proposal rounds. Indeed, this could be accomplished with one round of comments and a meeting, followed by a final work product. Do you agree with this recommendation? If your response is no, please explain and provide your suggestion for what process should be used. For example, should there be multiple rounds of stakeholder input (written comments), multiple meetings or multiple revisions to proposal documents?*

CMUA agrees that this process can be accomplished expeditiously and within the timeframes laid out by the Discussion Draft. We request clarification on how the Liaisons might develop an Issue Paper as referenced above, for example, that would form the basis for a consequent ISO-led stakeholder process. This is a role that is traditionally performed by ISO Staff. CMUA suggests that a similar effort to the EIM Transitional Committee be explored, whereby ISO resources were committed to support the efforts of the Transitional Committee, but the Transitional Committee took ownership of the work products.

*3. The RIF liaisons recommend that the RIF reevaluation final proposal and stakeholder feedback be presented to the EIM Governing Body for the ultimate decision and resolution under the current voting structure of the EIM Governing Body. Do you agree with this*

*recommendation? If your response is no, please explain and provide your suggestion for what resolution process should be used.*

CMUA agrees that on issues that are within their purview, the EIM Governing Body should have ultimate decisional authority. However, changes could involve other foundational governance documents that may require ISO Board action.

*4. The RIF liaisons recommend that the RIF reevaluation stakeholder process be completed by the July 13, 2017 meeting of the EIM Governing Body. Do you agree with this recommendation? If your response is no, please explain and provide your suggestion for what timeline should be used.*

CMUA agrees.

### **Relationship to EIM Governing Body/Other Topics**

*5. Right now, the RIF meets 3 times per year. Suggestions have been made to align RIF meetings with the EIM Governing Body schedule. That would increase time and meeting commitment, but would regularize RIF input into the Governing Body. Input on this issue would be valuable. The Liaisons believe that the EIM Governing Body should have a strong role in setting the agenda for the RIF to ensure feedback into the issues on which they must deliberate. We would appreciate input on this initial recommendation.*

CMUA agrees with the recommendation to align the RIF meetings with the EIM Governing Body schedule. There may not be sufficient meetings contemplated within the current structure to accomplish this goal, but at the same time that does not mean the RIF must meet at each Governing Body meeting. PGE supports the EIM Governing Body's desire to leverage the RIF discussions to inform their decision making and understanding of EIM issues.

*6. The expectation is that, in addition to the EIM Governing Body, agenda development and RIF meeting discussions would be led by stakeholders, channeled through the Liaisons for the purposes of organizing meetings. This is consistent with the last RIF meeting in Phoenix on November 29, 2016, where stakeholders led market issue discussions. It is expected that a primary role of the Liaisons will be to define a process for requesting agenda item. Meeting plans would establish deadlines for issue submissions or stakeholder presentations. Please provide thoughts on this general approach to RIF activities.*

CMUA agrees.

*7. The existing documentation for the RIF contemplates the possibility of written work product as a means of capturing stakeholder views or RIF opinions. The Liaisons believe that if this function remains in any final recommendation, a process for triggering and producing written material must be developed. Stakeholder views on whether this function should remain, and how to execute upon it are appreciated.*

CMUA has no position on whether or not the Liaisons should produce position papers on market issues. If the RIF Liaisons do retain that discretion, much more detail with respect to both trigger and other additions (perhaps to the Operating Guidelines) would likely be needed.

*8. Is the RIF delivering on all of the key functions described in the operating guidelines? If your response is no, please explain and/or provide suggestions.*

Yes.

*9. What should be the primary focus areas of the RIF?*

As stated in the Section 6.1.1 in the EIM Governance Charter and underscored in comments above, the RIF's primary focus should remain one of facilitating public dialogue on broad issues related to the Western EIM to benefit its ongoing expansion and evolution. CMUA notes that there is language seeking to bar the RIF from discussing issues in an ongoing ISO stakeholder process. CMUA does not wish to duplicate efforts. However, the RIF typically fosters a broader engagement of stakeholders that are not traditionally part of the ISO-led stakeholder process. Further, sometimes there is not a clear demarcation of issues. As such, the issue of whether there should be a more nuanced approach to this dividing line should be considered.

*10. Are there, at this early stage, any provisions of the EIM Governance Charter or other RIF documents that stand out as needing reconsideration?*

While CMUA has not studied this specific issue enough to make recommendations, it seems likely that changes to the Charter and other documents may be necessary. However, they need not be extensive.

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