

EIM Regional Issues Form (RIF) Draft Re-evaluation Issue Paper
Stakeholder Comments and RIF Responses

<i>Section</i>	<i>Party</i>	<i>Comment</i>
General	Bonneville Power Administration (BPA)	BPA is in support of the recommendations advanced in the Issue Paper
	Public Generating Pool (PGP)	The Public Generating Pool (PGP) represents ten consumer-owned utilities in Oregon and Washington, three of which own and operate Balancing Authority Areas (BAA)s. PGP has been a strong supporter of the Regional Issues Forum (RIF) since its inception and appreciates the opportunity to comment on the RIF Reevaluation Issue Paper developed by the RIF liaisons dated March 31, 2017.
Process and Timeline for Reevaluation	Bonneville Power Administration (BPA)	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.
	PacifiCorp	PacifiCorp supports the RIF's proposed schedule for the re-evaluation process, which will conclude by July 13, 2017. PacifiCorp also agrees that the EIM Governance Charter should be revised to remove the current RIF re-evaluation language, and such language should be replaced with a provision that allows for the RIF to call for a re-evaluation of the RIF as circumstances may warrant without any predetermined trigger date.
	Public Generating Pool (PGP)	PGP supports expediting the reevaluation process and recommends that to the extent there is consensus of stakeholder comments received in the first round of public comment due May 3, 2017, the RIF liaisons should focus the second round of revisions and comment period on needed modifications to the EIM RIF Operating Guidelines. PGP also supports removal of the current reevaluation language from the EIM Governance Charter. PGP does not believe any new language requiring reevaluation by a predetermined date is necessary. Any potential future reevaluations should be called for by the RIF or EIM Governing Body to the extent circumstances warrant such a reevaluation. The detailed schedule provided in support of completing the RIF reevaluation process by July 13, 2017 appears to be sufficient.
Possible Changes or Clarifications to RIF Roles and How the RIF Functions	PacifiCorp	The RIF recommends that its meetings should occur at least three times per year, but can be more frequent if needed or requested by stakeholders, the EIM Governing Body, or the Body of State Regulators. The RIF further proposes that the meetings should align with EIM Governing Body meetings or other regional meetings when possible. PacifiCorp agrees with these proposals and the RIF's proposal that meetings will be publicly announced via ISO market notice 21 days in advance. PacifiCorp encourages the RIF Liaisons to determine meeting dates as far in advance as possible and to share those dates prior to an ISO market notice where possible, in order to allow parties advance notice for scheduling and arranging travel. Moreover, PacifiCorp agrees that meetings should align with EIM Governing Body meetings or other regional meetings when possible. PacifiCorp also agrees with the suggestion of the EIM Governing Body during its April 19, 2017, meeting that the RIF Liaisons and the EIM Governing Body will need to coordinate far in advance of the ISO market notice for aligned meeting dates.
	Public Generating Pool (PGP)	PGP fully supports the proposed meeting frequency and coordination of the RIF. PGP supports announcement of the RIF meetings via ISO market notice and through the liaisons with at least 21 days-notice of the date and location, recognizing that more notice may be needed when RIF meetings align with EIM Governing Body meetings. PGP is supportive of the recommended process for meeting agendas and content. PGP supports the development of meeting agendas based on stakeholder input and/or requests for discussion by the EIM Governing Body or the EIM Body of State Regulators. Additionally, PGP supports the provision of the agenda two weeks prior to the meeting date and materials no less than one week prior to each meeting to allow meeting participants to determine attendance and sufficiently prepare for the RIF meetings.
	Bonneville Power Administration (BPA)	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.

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<p>Should the RIF Be Limited to Facilitating Dialogue or Consider Producing Recommendations and Opinions. What Subject Matter Areas Should be the Primary Focus?</p>	<p>Bonneville Power Administration (BPA)</p>	<p>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.</p>
	<p>PacifiCorp</p>	<p>In the Issue Paper, the RIF proposes to add an additional officer role of secretary, to be selected by the RIF Liaisons, to accommodate broad stakeholder consensus that the RIF should at least produce meeting minutes that can serve as a written record of RIF discussions. As stated in its previously submitted comments on the RIF’s discussion draft, PacifiCorp supports the proposal for the RIF to at least produce meeting minutes. Further, PacifiCorp agrees that it is reasonably necessary to add the additional officer role dedicated to produce the meeting minutes. PacifiCorp also agrees with the RIF that it should not lose the option to produce more substantive written products, such as a written opinion for the EIM Governing Body’s review and consideration.</p> <p>The RIF proposes in the Issue Paper that formal, substantive written opinions and recommendations would only be produced upon the specific request of the EIM Governing Body. However, during the April 19, 2017, EIM Governing Body meeting, the EIM Governing Body asked if there would ever be a time when the RIF produces a written opinion or recommendation without the EIM Governing Body requesting one. PacifiCorp believes that in the absence of the EIM Governing Body’s request for a written opinion or recommendation, the RIF should have the option of producing such written product if it deems the written product is warranted. Moreover, PacifiCorp agrees that any request by the EIM Governing Body for a written opinion or recommendation should be made sufficiently in advance of any decision by the EIM Governing Body on a particular issue, or allow sufficient time for review and production of the work product for matters not scheduled for decision by the EIM Governing Body.</p> <p>With respect to the issue of participation raised by Powerex in its comments on the discussion draft, PacifiCorp agrees with the RIF that the fact that there is a defined number of sectors does not delegitimize or disqualify the RIF from producing work products. This structure has worked successfully in other sector-driven efforts, such as the EIM Nominating Committee and the EIM Transitional Committee. In addition, PacifiCorp agrees that the RIF has been and remains open to full participation by any interested party and meetings and documents are subject to the rules of the ISO that seek to ensure transparency. PacifiCorp appreciates the RIF’s efforts to coordinate with the EIM Body of State Regulators and the EIM Governing Body to improve processes and lessen the burden to participate.</p> <p>With regard to EIM Governance Charter Section 6.1.1, that currently states, “generally speaking, the Regional Issues Forum would not consider individual policy issues that are currently part of an ongoing stakeholder process...,” PacifiCorp agrees that the primary function of the RIF is to facilitate discussions and provide educational or informational content on matters of interest to stakeholders, and believes it may be prudent to conduct RIF discussions on items that are already within a formal ISO stakeholder process. Therefore, PacifiCorp supports the RIF’s proposal not to exclude these discussions, while maintaining that these RIF discussions should not be considered a part of any existing, formal ISO stakeholder process.</p>
	<p>Public Generating Pool (PGP)</p>	<p>PGP finds the recommendation for the RIF to only produce written opinions and recommendations upon the specific request of the EIM Governing Body to be too limiting. The opportunity for written work products should be expanded to include summaries of stakeholder interests on existing and emerging issues for the benefit of RIF participants and the EIM Governing Body and that the development of such written work products could also be requested by the RIF.</p> <p>PGP agrees with clarifying the scope of the RIF to provide a forum for open discussion of issues already within a formal stakeholder process to enhance understanding of emerging EIM issues.</p>
<p>Should the RIF Be Limited to Facilitating Dialogue or Consider Producing Recommendations and Opinions. What Subject Matter Areas Should be the Primary Focus? <i>(Continued)</i></p>	<p>Southern California Edison (SCE) <i>(Specifically, P.6 Recommendation that, at the request of the EIM Governing Board (with 60 day notice), the RIF would develop and issue a written recommendation with majority and minority opinions)</i></p>	<p>recommendation with majority and minority opinions.</p> <p>The RIF was not designed as a body to advocate on current Stakeholder processes at the CAISO Board or the EIM Governing Body. Rather it was designed as a forum to discuss whether additional issues should be brought to the CAISO to initiate a Stakeholder process. SCE understands this proposal as potentially addressing the former (i.e. an opinion of the RIF regarding a current Stakeholder initiative). As such, SCE opposes this proposal.</p> <p>First, the RIF’s opinion is unnecessary as RIF represented stakeholders already have ample opportunity to express their view on any proposal. The RIF is structured in a manner that is designed to represent all market sectors. Therefore, if the RIF is appropriately representing the sectors as designed, the majority and minority opinion would do nothing more than replicate the opinions already submitted by individual market participants through the CAISO stakeholder process. A RIF’s opinion in such a matter should carry no more nor less weight than that expressed by any individual Stakeholder. As such, the structure of an official RIF’s opinion at a minimum would have the appearance of carrying a higher weighting than other market participant views.</p> <p>Finally, a 60 day advance notice could create delays in the stakeholder process. Generally, the CAISO publishes a final proposal prior to the CAISO Board/EIM Governing Body meetings about 30 days in advance. If the EIM Governing Body requested a RIF’s opinion, the timeline would be extended another 60 days for the RIF to issue their opinion before the EIM Governing Body makes a decision. Given that the opinions of the RIF should not differ from those expressed by any individual Stakeholder, this delay appears unwarranted.</p> <p>For the above reasons, SCE opposes the RIF’s issuance of an opinion or recommendation on CAISO proposals.</p>

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<p>What Changes, if any, to ISO Governing Documents are Necessitated by the Recommendations in this Issue Paper and How Would They be Accomplished? <i>Changes to EIM Governance Charter and RIF Operating Guidelines</i></p>	<p>PacifiCorp</p>	<p>During the February 28, 2017, EIM Governing body meeting, the ISO stated that its legal counsel would review the outcome of the RIF re-evaluation process to determine whether or not changes to any ISO governing documents, such as the EIM Governance Charter, are necessary, and if so, recommend such revisions. PacifiCorp agrees with this approach and looks forward to the ISO's recommendation. Additionally, as stated above, PacifiCorp believes that the EIM Governance Charter should at least be revised to remove the current RIF re-evaluation language, and such language should be replaced with a provision that allows for the RIF to call for a re-evaluation of the RIF as circumstances may warrant without any predetermined trigger date. PacifiCorp also supports the RIF's recommended revisions to the RIF Operating Guidelines regarding RIF meetings, as set forth in the Issue Paper.</p>