

Comments on the “Western Energy Imbalance Market Regional Issues Forum Reevaluation, Discussion Draft Prepared by the RIF Liaisons” (February 7, 2017).

Liaisons: Please accept the following comments of the Natural Resources Defense Council, developed in cooperation with allied organizations who may be submitting separately. Some duplication of comments may be noted. The comments below are organized as responses to the questions posed in your survey, attached.

NRDC is a national, non-profit organization of scientists, lawyers, and environmental specialists, dedicated to protecting public health and the environment. Founded in 1970, NRDC serves more than one million members, supporters and environmental activists with offices in New York, Washington, Los Angeles, San Francisco, Chicago and Beijing, China. NRDC has a long history of efforts to protect and conserve the nation’s air, water, lands and wildlife resources. NRDC also has a long history of advocacy promoting the increased use of energy efficiency and renewable energy sources to meet America’s energy needs both at the national level and in various states throughout the country.

General Comments:

The RIF is an important part of the EIM governance structure and should continue. A stakeholder driven process provides meaningful insights and early detection of stakeholder issues that ultimately strengthen the decision making processes of the EIM Governing Body and the CAISO Board.

Specific Comments on the “Stakeholder Process Questions:”

- 1) We support a bottom-up process shaped by stakeholders to supplement and support the CAISO stakeholder process. Liaisons should conduct comprehensive outreach to stakeholders and synthesize their feedback into affirmative recommendations. Details about where there is RIF consensus and where there are alternative opinions among individual sectors would be helpful. Written recommendations can and should be included in the CAISO stakeholder process.
- 2) Yes, we agree that one round of draft recommendations and comments could be sufficient. If the RIF determines that additional rounds are necessary, that is also appropriate, as needed.
- 3) We agree that the RIF reevaluation is a “primary authority” issues for the EIM Governing Body and that the RIF recommendations should be presented to the EIM Governing Body before the Governing Body makes their recommendation to the CAISO Board. The RIF recommendations should also be included in the CAISO stakeholder process on this topic. Stakeholders should also retain the right to comment directly to the EIM Governing Body through the CAISO stakeholder process.
- 4) July 13, 2017 seems like a reasonable goal to us.
- 5) Three to four meetings per year, as necessary, seems appropriate and reasonable. Coordinating the RIF meetings with EIM Governing Body meetings makes sense, but the RIF likely does not need to meet in person as often as the Governing Body. If additional input is required, the RIF chair could participate in the Governing Body meeting by phone or in person as often as necessary. We think the EIM Governing Body should be consulted when the RIF is setting agendas to ensure they are getting the feedback they require, but that the RIF agenda should ultimately be set by the stakeholders and the liaisons themselves. It is important for stakeholder outreach to

continue the practice of holding RIF meetings in other states in the WECC footprint, outside of California.

- 6) This seems like a good approach to us. Also see answer to question number five above.
- 7) First, any recommendations that are made by the RIF to the EIM Governing Body should be written. We also think that the RIF should strive for providing written feedback on issues wherever possible. A formal representation of areas of consensus and disagreement will help inform the record in the CAISO stakeholder processes.
- 8) Yes. Some additional thoughts are provided below.
- 9) The primary focus of the EIM should be to facilitate regular, constructive and meaningful dialogue between the EIM Governing Body and stakeholders. Using the RIF to flag important emerging EIM issues and to facilitate discussion on those items until they are either resolved or formally included in the CAISO stakeholder process is an important part of the RIF's role. We also observe models employed at Peak, WECC, NERC, and SPP, where stakeholder groups are also used to facilitate discussion on current stakeholder issues as a way to better inform the dialogue and the formal record in that process. The EIM Governing Body and the RIF should consider such a role for the RIF as a part of this reevaluation process.
- 10) No additional items as this time.

If you have any questions regarding these comments, please contact me directly. Thanks for your consideration of our views.

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