



Portland General Electric Company
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**COMMENTS OF PORTLAND GENERAL ELECTRIC COMPANY
ON THE EIM REGIONAL ISSUES FORUM DRAFT OPERATING GUIDELINES
July 27, 2016**

Portland General Electric Company (“PGE”) appreciates the opportunity to submit comments to the California Independent System Operator Corporation (“ISO”) on the EIM Regional Issues Forum (“RIF”) draft Operating Guidelines, published June 13, 2016 (“Operating Guidelines”).

The ISO has published draft Operating Guidelines for the RIF to express potential concerns and raise issues with the EIM Governing Body. PGE’s comments on the Operating Guidelines are as follows.

The Operating Guidelines provide that the purpose of the RIF “is to provide a forum for stakeholders to learn about the EIM, the EIM Governing Body, and related ISO developments that may be relevant to the RIF,” and will not replace the ISO’s existing stakeholder process. PGE strongly agrees that the RIF should emphasize education and learning opportunities for interested stakeholders and serve as a vehicle to convey issues and concerns, as deemed appropriate by the RIF, to the EIM Governing Body.

PGE supports the responsibilities of the RIF proposed in the Operating Guidelines. However, PGE offers comments specifically on item number six, which states that the RIF shall “[e]stablish a process through which it may express a common position on establishing ISO stakeholder processes or to the EIM Governing Body on EIM issues.” PGE recommends that this responsibility be revised to more clearly reflect that the RIF is not expected to reach a consensus “position” on EIM policy matters. The RIF may reach and express a common position on the need for particular stakeholder processes or discussion of EIM issues, but is not expected to agree on a position for the resolution or outcome of the issues.

PGE supports the proposed membership and leadership provisions, which provide for two liaisons from each sector, with one liaison serving as the chair and another as the vice-chair, each for a term of one year. PGE also agrees with the sector descriptions, the ordering of the sectors should a liaison nominee qualify under more than one sector, and the process for removal of a sector liaison. PGE believes that the meeting requirements in the Operating Guidelines are appropriate, with one modification. Section 3.b.ii. provides that “[a]ction taken by the RIF shall normally be by consensus.” As indicated in the comments above regarding RIF responsibility

number 6, PGE requests modification of this provision to more clearly reflect that the RIF is not expected to reach a consensus "position" on EIM policy matters.

PGE generally supports the proposed notice and Operating Guidelines review and changes provisions, including reconsideration of the efficacy and role of the RIF through a stakeholder process after 18 months, and no later than April 2017.

PGE appreciates the ISO's and RIF members' consideration of these comments.