



CAISO's EIM Regional Issues Forum Operating Guidelines

Public Generating Pool Comments

June 27, 2016

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 appreciates the opportunity to comment on the California ISO Energy Imbalance Market Regional Issues Forum Operating Guidelines dated June 13, 2016. PGP's comments focus on the purpose statement and assignment of a sub-team to the issue of bidding at EIM intertie points.

Purpose and Responsibilities

In the RIF Operating Guidelines under the purpose and responsibilities section, the purpose of the Regional Issues Forum is stated "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 Regional Issues Forum."

The purpose statement makes the Regional Issues Forum sound like an educational forum and not necessarily an action-oriented forum where issues are brought forward to be worked on and advanced to a CAISO stakeholder process of the EIM Governing Body. While PGP understands this forum is not a decision making forum or a forum meant to replace any ISO stakeholder processes, the Regional Issues Forum has been described as an advisory committee to the EIM Governing Body and a forum to be used for producing working documents and possibly common positions on EIM related issues. PGP suggests the following modification to better align the purpose statement with what is described in the final EIM Governance straw proposal as adopted August 19, 2015:

*"The purpose of the RIF is to provide a forum **for addressing broader issues of EIM operations**. It is not the intent that the RIF displace the ISO's existing stakeholder process."*

Bidding at EIM Interties

Also under the purpose and responsibilities section of the RIF Operating Guidelines, it is stated that "The RIF shall...assign sub-teams made up of the sectors' subject matter experts to evaluate specific EIM issues and report back to the RIF and stakeholders with any recommendations for solutions."

At the April 6th, 2016 Regional Issues Forum, bidding at the EIM interties was brought up as an important issue to all five stakeholder sectors. **PGP requests that by the next Regional Issues Forum meeting on August 4th, 2016, this topic be assigned a sub-team to be further evaluated.**