



**Western Energy Imbalance Market Regional Issues Forum Re-evaluation
Discussion Draft
Public Generating Pool Comments
February 22, 2017**

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 Discussion Draft of the Western Energy Imbalance Market (EIM) RIF Re-evaluation prepared by the RIF liaisons dated February 7, 2017.

The RIF has been slow to get started and, due to circumstances outside its control, has not been as active as PGP had envisioned. The RIF was contemplated to be a place where the interests of stakeholder groups outside the EIM but impacted by the EIM, such as neighboring Balancing Authority Areas, can be represented. In addition, the Transitional Committee envisioned that stakeholder representatives could reach agreement on complex and even potentially divisive issues when they work closely together in a group of manageable size. The Transitional Committee noted that in all other multi-state centralized markets, a body of designated sector representatives plays a key role in policy and market matters. The idea was to enhance the ISO's existing process for stakeholder input, which centers around written comments rather than face-to-face communications. The RIF re-evaluation process should focus on how to create some formality and structure around the intended purpose of the RIF and should not be used to try to modify its role.

Below are PGP's responses to the Stakeholder Process Questions in the Discussion Draft.

1. **RIF LIAISON ROLE IN PROCESS:** PGP believes the RIF liaisons should play an active role coordinating and facilitating stakeholder input. PGP agrees that the RIF re-evaluation process should be a bottom-up process shaped by stakeholder input. The RIF liaisons can serve to channel stakeholder feedback and make affirmative recommendations in areas where there is reasonable agreement among the sectors. PGP believes it is appropriate for the RIF to develop comprehensive work products, which could include development of an initial proposal, summary of comments or recommended alternatives.
2. **STAKEHOLDER PROCESS:** PGP is not opposed to shortening the RIF re-evaluation stakeholder process to one round of stakeholder comments, although it is more likely that two rounds of stakeholder comments are needed to ensure stakeholder input is properly addressed. PGP recommends the RIF re-evaluation stakeholder process consist of a combined issue paper/straw proposal followed by a stakeholder meeting, stakeholder comment period, 2nd draft straw proposal, stakeholder meeting, stakeholder comment period and final proposal. It is also important that responses to stakeholder comments are provided after each round of stakeholder comments.



3. **EIM GOVERNING BODY AS DECISION MAKER:** PGP agrees that the RIF re-evaluation final proposal and stakeholder feedback be presented to the EIM Governing Body for ultimate decision and resolution.
4. **COMPLETION DATE:** A completion date of July 13, 2017 for the RIF re-evaluation stakeholder process is a reasonable timeline. PGP recommends that the process not take any longer than that.
5. **RIF MEETING FREQUENCY:** PGP agrees that aligning the RIF meetings with the EIM Governing Body schedule would regularize RIF meetings and input into the EIM Governing Body. However, it may not be necessary for the RIF to meet every time the EIM Governing Body is scheduled to meet. The RIF should meet at least quarterly but could meet additionally if issues arise that drive the need for further meetings.
6. **STAKEHOLDER ROLE IN RIF MEETINGS:** PGP agrees that agenda development and RIF meeting discussions should be driven by stakeholders. This model proved to work effectively at the RIF meeting in Phoenix on November 29, 2016. A clear and consistent process for requesting agenda items is needed. The proposal should include a standardized process for liaisons to engage with sector participants to ensure all stakeholders are kept abreast of RIF activities and are offered the same opportunity and timelines to provide input.
7. **RIF WORK PRODUCTS:** The possibility of written work product as a means of capturing stakeholder views or RIF opinions should remain. PGP agrees that a process for triggering and producing written material should be developed.
8. **IS RIF MEETING KEY FUNCTIONS:** Since its formation, the RIF has not had much formality and consistency in how it operates, how RIF activities are communicated and how feedback is solicited and provided from sector participants. Communication from liaisons to sector participants has been inconsistent which, at times, has created lack of awareness of RIF activities and comment periods. It would serve the RIF and its stakeholders well to develop more formality and standardization in these areas as part of the RIF re-evaluation process.
9. **RIF PRIMARY FOCUS AREAS:** PGP provides the following suggested primary focus areas for the Regional Issues Forum:
 - a. Provide a forum for stakeholders to identify, discuss and better understand different perspectives on EIM-related issues.
 - b. Provide a forum for the EIM Governing Body to get informal input from the different stakeholder sectors.
 - c. Develop written work products, such as papers that provide background and explanation of a certain issue along with documentation of different stakeholder perspectives on the issue.
10. **RECONSIDERATION OF ANY ELEMENT OF GOVERNANCE:** PGP assumes the conclusion of this process will result in revisions to the RIF Operating Guidelines.