

**Comments of Powerex Corp. on Regional Issues Forum  
Reevaluation Discussion Draft**

Submitted by	Company	Date Submitted
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Powerex appreciates the opportunity to submit comments on the Regional Issues Forum (“RIF”) Reevaluation Discussion Draft. In the Discussion Draft, the RIF Liaisons solicit comments on a range of issues related to the proper role of the RIF in the broader governance structure of the Energy Imbalance Market (“EIM”). Among other things, the Discussion Draft solicits stakeholder comments on whether the RIF should continue to exist and whether the RIF should establish a formal process for issuing position papers expressing the position and views of the RIF as a whole.

Powerex supports the continued existence of the RIF. In particular, Powerex believes that it is valuable for stakeholders to have a forum to engage in dialogue about issues of common concern related to the EIM, including the impact of EIM operations and potential modifications to the EIM structure that could benefit stakeholders. Powerex also believes that it is critical that *all* stakeholders have the right to propose topics to be taken up by the RIF and for *all* stakeholders to have an equal opportunity to participate in any resulting discussions. Conversely, no stakeholder or class of stakeholder should have undue influence over, or a preferential role in the conduct of, the RIF. In particular, Powerex believes it is imperative that (i) entities that are currently participating in the EIM, (ii) entities that have expressed interest in exploring future participation in the EIM, and (iii) entities that have not expressed any interest in participating in the EIM are all provided with an equal opportunity to propose topics and express their viewpoints at the RIF.

While Powerex supports the continued existence of the RIF, Powerex does not believe that it would be appropriate or valuable for the RIF to make any recommendations to the EIM Governing Body or otherwise issue documents purporting to express the “view” of the RIF. By design, the RIF is not an independent body, but is composed of sector liaisons that may not represent the full range of stakeholder interests or views. Consequently, any position formally expressed by the RIF may well represent only a subset of the views of stakeholders involved in, or affected by, the EIM. Instead of establishing a formal position or view of the RIF, Powerex believes that it would be more appropriate—and potentially more informative—to simply transmit to the EIM Governing Body the minutes of any RIF meetings, including a summary of the views expressed at the meeting. Powerex believes that transmitting the minutes of the meeting, without attempting to take any position respecting the issues discussed, will ensure that all views expressed at RIF meetings are accorded equal weight and heard by the EIM Governing Body. This approach would also maximize the time at RIF meetings

available for substantive discussion of issues rather than investing time attempting to forge a “consensus view” that is likely to be of limited value or accuracy.