

**Comments on:
Regional Issues Forum Draft Re-evaluation
Issue Paper Developed by RIF Liaisons
Issued March 31, 2017**

Submitted by	Company	Date Submitted
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The Regional Issues Forum (RIF) published on March 3, 2017, a draft issue paper (Issue Paper) to re-evaluate their operations which provided various recommendation.¹ SCE submits comments on the recommendation to issue an opinion report from the RIF.

On page 6, the Issue Paper make a recommendation that at the request of the EIM Governing Board (with 60 day notice) the RIF would develop and issue a written recommendation with majority and minority opinions.

The RIF was not designed as a body to advocate on current Stakeholder processes at the CAISO Board or the EIM Governing Body. Rather it was designed as a forum to discuss whether additional issues should be brought to the CAISO to initiate a Stakeholder process. SCE understands this proposal as potentially addressing the former (i.e. an opinion of the RIF regarding a current Stakeholder initiative). As such, SCE opposes this proposal.

First, the RIF's opinion is unnecessary as RIF represented stakeholders already have ample opportunity to express their view on any proposal. The RIF is structured in a manner that is designed to represent all market sectors. Therefore, if the RIF is appropriately representing the sectors as designed, the majority and minority opinion would do nothing more than replicate the opinions already submitted by individual market participants through the CAISO stakeholder process. A RIF's opinion in such a matter should carry no more nor less weight than that

¹ <http://www.caiso.com/Documents/RegionalIssuesForumUpdate-DraftRe-EvaluationIssuePaper-Apr2017.pdf>

expressed by any individual Stakeholder. As such, the structure of an official RIF's opinion at a minimum would have the appearance of carrying a higher weighting than other market participant views.

Finally, a 60 day advance notice could create delays in the stakeholder process. Generally, the CAISO publishes a final proposal prior to the CAISO Board/EIM Governing Body meetings about 30 days in advance. If the EIM Governing Body requested a RIF's opinion, the timeline would be extended another 60 days for the RIF to issue their opinion before the EIM Governing Body makes a decision. Given that the opinions of the RIF should not differ from those expressed by any individual Stakeholder, this delay appears unwarranted.

For the above reasons, SCE opposes the RIF's issuance of an opinion or recommendation on CAISO proposals.