

Comments on Regional Issues Forum Enhancement Project Draft Final Proposal (published Nov. 4, 2025)¹

Submitted via email to: EIMRIF@caiso.com

The following public interest organizations submit these comments: Western Resource Advocates (WRA), Renewable Northwest (RNW), National Resources Defense Council (NRDC) and NW Energy Coalition (NWEC). We support the RIF's effort to evolve and enhance the RIFs role and responsibilities. As part of this effort, we agree a transition of the stakeholder process toward the structure envisioned under the Pathways Initiative², ahead of the full implementation of the Regional Organization (RO) and the Stakeholder Representatives Committee (SRC), is the optimal way forward.

The Draft Final Proposal includes a Comment Template. Below are our responses to those questions.

Near Term Enhancements

Policy Initiatives Catalog and Roadmap

1. Are there any additional considerations that you would propose to enhance the Catalog and Roadmap process other than those proposed in this draft final proposal?

We support the considerations included in the RIFE Draft Final Proposal and highlight the consideration of stakeholder time and resources. This is memorialized, for example, in the criteria for evaluating potential changes:

- “... and place additional limited workload on RIF liaisons.”
- “Provide benefits to the RIF stakeholder community through...increased stakeholder engagement.”³

An important aspect to consider is disparity. Not all organizations have the same capacity for participation; the stakeholder process should support and encourage participation by a wide range of stakeholders. Capacity limitations of an organization should not be a hurdle to participation or drown out their voice in the process. This proposal appears to strike the right balance and importantly there is room for adjustment later should implementation fall short of this or other criteria and considerations.

¹Available at: <https://www.westernenergymarkets.com/documents/regional-issues-forum-enhancement-project-draft-final-proposal-nov-07-2025.pdf> (“RIFE Draft Final Proposal”).

² WWGPI Launch Committee, Step 2 Final Proposal (November 15, 2024), available at: <https://www.westernenergyboard.org/wp-content/uploads/Pathways-Initiative-Step-2-Final-Proposal.pdf> (“Step 2 Final Proposal”).

³ RIFE Draft Final Proposal at 4, 4th and 5th bullets.

2. Do you support the proposed enhancements to the RIF's involvement in the catalog and roadmap process?

Yes; and see our comment to the previous question.

Sector Sponsor Pilot Program:

1. Are there other guidelines the RIF should consider for defining the sponsor role?

See our comment to Policy Initiatives Catalog and Roadmap, Question 1. The Step 2 Final Proposal contains much detail about staff support for sponsored initiatives, essentially staff would partner with the co-sponsors and provide robust support.⁴ We strongly support this level of staff support as it is an important tool to encourage and support broader participation at all levels in the stakeholder process which includes initiative co-sponsorship.

2. Is there a particular initiative from the 2025 Policy Initiatives Catalog that you believe the RIF should consider for piloting the sponsor role?

In 2022/2023, CAISO adopted a policy to judiciously increase the use of working groups: using working groups in any initiative that is complex enough to have a wide range of possible solutions, and is significant enough in terms of impact to market participants or other stakeholders to be worth extra work.⁵ This policy balances support for an increased role for stakeholders in policy development with the concern about different capacity limits of different organizations --small organizations struggle to meaningfully participate which can create an imbalance of influence if working groups are used for all initiatives.⁶

We continue to support the judicious increase in the use of working groups and the standard for application expressed above (complex and transformative issues) as we advance to the use of co-sponsors to lead these working groups. However, for the pilot project, one in which kinks in the process may arise and need to be worked out, we suggest choosing a shorter or less complex initiative. An additional benefit of choosing a less complex issue for the pilot is that more stakeholders may understand the initiative and be able to evaluate if the outcome from the process is positive or if process changes need to be made for future initiatives.

⁴ Step 2 Final Proposal at 84-86.

⁵ The Step 2 Final Proposal uses the terms “transformative” and “complex” that may begin as “conceptual”. Step 2 Final Proposal at 101-102.

⁶ CAISO, Western EIM Governance Review - Phase Three (EDAM), GRC Revised Proposal, §V.A. (October 31, 2022).

Indicative Voting:

1. Which report types would be the most helpful when reporting the indicative voting results?

a. Examples: by region, generator only, load only, combined generation and load stakeholders

Our priorities are sector and region. Though not specifically stated in the RIFE Draft Final Proposal, we assume the sector report will report out individual votes. We are not opposed to additional report types but are aware we must balance staff resources with the value of additional reporting requirements.

We agree with the rationale in the Draft Final Proposal for including indicative voting. It provides additional transparency and useful information for stakeholders and decision-making bodies. We also strongly agree that it is just one piece of a healthy stakeholder feedback process. The opportunity for written comments continues to be an extremely valuable tool for stakeholder feedback. Further, there are limits to the value of voting and we support indicative voting only and only at key junctures in the stakeholder process.⁷

In the RIF, the Consumer Advocates (CA) and Public Interest Organizations (PIO) are in a combined sector; however, in the SRC they will be in two separate sectors. The RIF Public Interest / Consumer Advocate sector is taking steps now to operate as two sectors in the future, such as assigning separate responsibility for creating and maintaining two distribution lists, one for the CAs and one for PIOs. If it is not a strain on resources, reporting votes for PIOs and CAs separately would continue to support this path forward.

2. Which report types would be the most helpful when reporting indicative voting results?

Provide any additional indicative voting reports that should be considered.

See answer to previous question. No further comment at this time.

Function and Purpose of the RIF

Stakeholder perspectives on RIF's role and process for providing comments on behalf of the RIF.

We agree with the recommendations in the RIFE Draft Final Proposal.⁸ As the RIF liaisons work with stakeholders to develop the process for choosing comment topics and developing the comments, we highlight two important components, ensuring that the processes: support and encourage participation by a diverse group of stakeholders and preserve and convey minority opinions in the work products.

⁷ By this we mean official indicative voting. We have no objection to informal straw polls being used as needed.

⁸ RIFE Draft Final Proposal at 14-15.

Facilitate Transition of the RIF into SRC:

Are there any additional actions that would be important for the RIF and Pathways to consider in order to effectuate this transition?

We do not recommend any additional actions at this time. We agree with the goals of the RIFE, specifically, creating a glide path for the transition of the RIF to the SRC and recommending changes that would be beneficial regardless of the proposed RIF to SRC evolution process. Further, the RIFE Draft Final Proposal strikes a good balance between meeting these goals with minimal disruption to the CAISO stakeholder process. The next two years, as Pathways moves towards full implementation, will be very important as EDAM is being implemented and other important policy initiatives will be developed in the CAISO stakeholder process. Therefore, it is important that the CAISO stakeholder process remain solid and robust.

We appreciate the opportunity to submit these comments.

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