Bonneville Power Administration
Response to Regional Issues Forum Enhancements Project Discussion Paper

Submit comments to EIMRIF@caiso.com

SRC Transition Approach and Process

1. Please state your organization's support for the proposal to transition the RIF into the SRC:
    - Support
2. Please comment on the proposal for the RIF to transition into the SRC under the Pathways Step 2 Final Proposal.

Bonneville supports the RIF developing a transition plan to move to the SRC structure ahead of the RO formation. By making the transition ahead of RO formation, the SRC would be in place to help guide the RO formation and provide a structured venue for stakeholder input throughout the RO's launch. The RIF should begin taking action sooner rather than later to facilitate this transition both for the sectors and the scope of the group.

Process and Timing for Potential Revisions to Sectors

3. Please state your organization's support for the proposal to establish and reorganize the sectors of the RIF on a transitional basis to align with the sectors of the SRC:
    - Support

4. Please comment on the Paper's discussion of transitioning the current sectors of the RIF to the sectors of the SRC. What process and timing issues relating to changes in the sectors, including for the establishment of new sectors, does your organization believe should be addressed by the RIF?

As shared in question two above, Bonneville supports a transition to the SRC sectors in advance of the formation of the RO. This would give the SRC and sectors the ability to provide input throughout RO formation. Bonneville anticipates that the RIF will need to consider how to proceed depending on the ultimate disposition of SB 540 at the close of the current California legislative session. While it does not need to be decided now, the RIF should begin to consider, for example, whether to proceed with changes to sector representation in the near term if SB 540 does not pass the legislature this session.

5. Should the RIF implement sector changes on a transitional basis to accommodate the timing needs for the RO Board Nominating Committee under the Step 2 Final Proposal?

Bonneville would support implementing sector changes on a transitional basis if SB 540 passes and the RO looks likely to proceed with formation on the currently planned schedule. As noted in

question 4, if there are likely to be delays in RO formation, the RIF should reconsider the timing for sector changes.

Role of the RIF and Potential Changes to align with the Stakeholder Representatives Committee

Role in Policy Initiative Identification and Prioritization (Catalog/Roadmap Processes)

6. Please comment on the role of the RIF within the CAISO's Annual Policy Initiatives Catalog and Roadmap Process. Although the role of the RIF within the current process is similar to the envisioned role for the SRC within the RO policy initiative prioritization process, are there additional functions that the RIF should be performing as a part of the Catalog and Roadmap Process?

Bonneville suggests including a role for the RIF to review and advise on the roadmap on an ongoing basis. For example, if CAISO staff need to make changes in the roadmap to re-prioritize initiatives or make significant changes to the schedules, the RIF would act in an advisory capacity to the CAISO staff to provide sector input on those proposed changes.

7. Should the RIF encourage the CAISO to administer a process whereby stakeholder statements of position or advisory votes (akin to the voting process contemplated for in the Step 2 Final Proposal) are solicited on the final Catalog/Roadmap documents?

Yes. Bonneville supports efforts to solicit stakeholder statements of position or advisory votes and to share those votes with the RIF liaisons to inform statements of position and with Governing Body members to inform decision-making.

Although this decision is outside the scope of the RIF enhancements, Bonneville recommends that the CAISO incorporate a step in the Policy Initiative Catalog and Roadmap process for the WEM Governing Body to approve the final roadmap prioritization. The RIF would then have a role in advising the Governing Body members on the perspectives of the sectors.

Role in Stakeholder Initiative Phase (Stage 1 Issue Evaluation/Problem Statement and Stage 2 Policy Development)

8. Please state your organization's support for the proposal to establish the role of sector sponsors within the stakeholder initiative process:
    - Support

9. Please specify any considerations that you believe are relevant to establishing the role of the sector sponsor. Do you agree with how this role has been defined as set forth above?

Bonneville supports creating the role of the sector sponsor and supports it as defined. Based on experience in other markets, Bonneville recommends that there be multiple sector sponsors on an initiative. This would provide diversity of perspective from across the sectors and share the workload across sponsors and sectors. Having multiple sector sponsors could also support and encourage collaboration across sectors.

10. Would your organization support the start of indicative voting during CAISO stakeholder processes? At what points during the process should votes be cast, *i.e.*, problem statement development, straw proposal, final proposal, etc.?

Bonneville strongly supports using indicative voting during the CAISO stakeholder processes. It would be ideal to integrate voting at major stage gates in the process. For example, problem statement definition/confirmation; straw proposal; and final proposal. Indicative voting could provide helpful input to the CAISO staff and initiative sponsors throughout the process. It is particularly important at the final proposal to provide insight to WEM Governing Body members on stakeholder perspectives. Bonneville recommends that the indicative voting be compiled, analyzed and shared publicly, as was done with the Pathways Step 1 proposal indicative voting.

Function and Purpose of the RIF

11. Does your organization support the RIF exercising a more active role in advising the WEM Governing Body and/or CAISO regarding the positions of stakeholders on initiative topics in a stakeholder process or that are before the Governing Body? Are there procedures that your organization believes the RIF should follow in carrying out this function?

Bonneville supports the RIF building a more active role in advising the WEM Governing Body regarding stakeholder positions. As the RIF continues to build its engagement with initiatives, it will be well-positioned to advise the Governing Body on sector perspectives on issues. The sector sponsor role should give RIF liaisons additional insight into specific initiatives and the trade-offs and collaboration occurring within initiative processes. Bonneville expects the RIF to use this insight in writing position statements or summaries of sector positions to advise the Governing Body.

Immediate steps towards this role would be to continue to share sector perspectives on policy alternatives with the Governing Body and to support indicative voting. The RIF should play a role in analyzing and reporting on the results of indicative voting to the Governing Body.

12. Do you support the RIF taking steps to move away from providing information or educational content during its meetings? Should the RIF move its focus to discussion of issues that are actively pending in stakeholder processes?

Bonneville tentatively supports the RIF eventually stepping away from educational content during its meetings. However, it would be most appropriate to step away from this role after the Regional Organization is created and the Office of Public Participation has been developed. Even then, the RIF will still need to play a role in engaging stakeholders with information and more in-depth market and initiative education than the Office of Public Participation is envisioned to provide.

13. Please provide input on any other specific proposals that the RIF should consider to support and facilitate stakeholder involvement in the initiative process.

Other comments

14. Please provide comments regarding the process and timeline for the RIF Enhancements project.

Bonneville recommends that the RIF consider whether and how the enhancements project plan would be impacted by outcomes from the California legislature's consideration of SB 540. Specifically, whether there are elements of the plan that may be put on hold if SB 540 does not advance in this session, and whether there are enhancements that should proceed regardless of the legislative outcome.

15. Please provide comments regarding any other aspect of the RIF Enhancements project.