

Regional Issues Forum Enhancement Project – Draft Final Proposal

Comments on behalf of the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (“Six Cities”)

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?

Six Cities’ Comments: At this time, the Six Cities do not have any additional recommendations relating to the involvement of the RIF in the CAISO Annual Policy Initiatives Catalog and Roadmap process. The process outlined in the Draft Final Proposal generally appears to align with existing approaches, with the addition of enhanced opportunities for coordination and collaboration with CAISO staff in the formulation of Catalog and Roadmap priorities (as to discretionary policy issues), consideration of stakeholder positions as conveyed through voting and comments, and with respect to changes in the initiative prioritization once the Roadmap is issued. The Draft Final Proposal is relatively general in terms of how these enhancements will be implemented, and the Six Cities encourage the RIF to provide transparency to stakeholders once the RIF has experience with how these enhancements work in practice. For example, the upcoming Roundtable in 2026 could provide an opportunity for the RIF to discuss and explain to the RIF community what steps of the Catalog/Roadmap process will be different as a result of the enhancements in the Draft Final Proposal.

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

Six Cities’ Comments: The Six Cities generally support the proposed enhancements. With respect to voting, the Six Cities reiterate that any voting should not be determinative of the priorities for the annual Roadmap, but should be one among multiple factors that are considered in developing the Roadmap.

Sector Sponsor Pilot Program:

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

Six Cities’ Comments: The Six Cities support the concepts that the Draft Final Proposal outlines for the sponsor role, including, in particular, the emphasis on appropriately balancing the sponsor’s role as a facilitator for the initiative with the interests and positions of the organization that the sponsor represents. The Six Cities also support having “co-sponsors” for the reasons discussed in the Draft Final Proposal.

Following the completion of the pilot program, the Six Cities encourage the RIF to provide a report on the program to the RIF community, together with any recommendations for revisions or clarifications to the sector sponsor role, and to seek feedback from stakeholders and the CAISO on the pilot program.

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

Six Cities' Comments: At this time, the Six Cities have not identified a specific initiative for piloting the sector sponsor role.

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

Six Cities' Comments: Any of the specified metrics listed in the Draft Final Proposal would potentially provide insight into the perspectives of stakeholders, and it is likely that the various groupings will provide more or less insight into stakeholder perspectives depending on the particular issue or initiative. As a refinement to the “generator only, load only” categories, it may make sense to report results based on whether the voting entity is a net buyer or a net seller. The Six Cities note that additional options for voting tabulation are listed on page 110 of the West-Wide Governance Pathways Initiative Step 2 Final Proposal. All of these categories are likely not needed for each issue or vote (and could be burdensome to tabulate), but several of them could likely provide possible insight into stakeholder positions depending on the initiative. Beyond the categories listed above in question no. 1.a., it appears that groupings by sector and by Balancing Authority Area would be relevant to consider. As the stakeholder community gains experience with the voting process, the groupings that are the most useful may emerge over time.

2. Which report types would be the most helpful when reporting indicative voting results?
Provide any additional indicative voting reports that should be considered.

Six Cities' Comments: Please refer to the comments above in response to question no. 1. Additionally, the Six Cities reiterate that in addition to the statement of position on an issue or initiative that is represented by a “support” or “oppose” vote, stakeholders’ comments will continue to be critical for fully capturing their positions. For this reason, the Six Cities support the use of the “support with caveats” or “oppose with caveats” categories with opportunities for narrative comments.

Function and Purpose of the RIF:

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

Six Cities' Comments: The Six Cities support the proposal that the RIF work with stakeholders to develop more formalized processes for the RIF to comment on initiatives and issues. The Six Cities also agree with the proposal for the RIF to retain its educational function and to continue to operate as a forum for discussion of broader market issues.

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?

Six Cities' Comments: The Six Cities generally support the approach in the Draft Final Proposal, as to both the potential for the RIF to transition into the SRC and as to the evolution of sectors to eventually align with the Step 2 Final Proposal. As the RIF moves forward, it will be important to ensure that stakeholders are kept apprised of the coordination work occurring with the West-Wide Governance Pathways Initiative effort and the RIF. The Six Cities suggest that the RIF periodically report on the status of these efforts and seek stakeholder comment on any transition process that is ultimately adopted.

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