

**California Department of Water Resources – State Water Project
Comments on the ROWE Stakeholder Process**

1. What happens with joint/shared CAISO-ROWE authority? As we see it, ROWE will run its own stakeholder process for initiatives that only affect ROWE, and CAISO will run its own process for initiatives that only affect CAISO. What's not defined is the area where an initiative affects both. The Step 2 Proposal calls this "Shared Authority," alongside "ROWE Sole Authority" and "CAISO Sole Authority," but stakeholders specifically asked for a defined process to determine which category applies and how it would work, including timing, stakeholder engagement, and dispute resolution in their comments. The Narrative doesn't provide this. It only says a "decisional classification" will be assigned during straw proposal development, with the method to be worked out between ROWE and CAISO. It doesn't say whose Catalog/Roadmap a shared-authority initiative would live in, how the two organizations would coordinate timing, or how a dispute over classification or outcome would get resolved.
2. The Stakeholder Process Narrative document says on page 7 that Staff will “determine if the stakeholder process is the appropriate forum, or if the submission belongs in another process (i.e. business practice manual change process, customer inquiry, dispute and information (CIDI) process).” Will these continue through CAISO’s existing processes or will ROWE make new processes. For example, will ROWE start a new BPM process or will CAISO’s current BPM PRRs continue?
3. Page 7 of the document also says “If a stakeholder disagrees with the proposed classification, they are encouraged to work with staff to find consensus. If consensus cannot be achieved, they may go to the ROWE Board with their concerns.” Will there be a dedicated forum for these discussions with Staff or will individual meetings need to be arranged? If stakeholders go to the ROWE Board with their concerns, will this take the form of a public comment during a ROWE Board meeting or will there be a process for submitting items to ROWE before the next meeting.
4. On pages 12 and 13, the document states, "An open comment period and vote will follow the meeting." There are no specifics given as to who is voting (stakeholders, or the SRC) or how the voting will be done. The lack of clarity can be seen clearly when the language on pages 12 and 13 is compared with the discussion of voting in the context of problem statements on page 16.
5. Several times in the document actions appear to hinge on "consensus." There is no definition of consensus offered (is it 50% + 1?), further it's not entirely clear as to whose consensus is being referred to, nor is there any discussion of what the offramps might be where consensus is not achieved.
6. Finally, there is a typo in point (7) on page 18 where "commend" should be "comment."