



PacifiCorp Comments on the Stakeholder Process Public Meetings

PacifiCorp appreciates the opportunity to comment on the Stakeholder Process Workshops. PacifiCorp has provided responses according to the comment template below.

1. Policy topic selection: who selects among a list of competing priorities for stakeholder attention?

PacifiCorp believes that the Regional Issues Forum (RIF) is well positioned to help determine which policy topics should move through the stakeholder process. The RIF is already providing input to the annual policy initiatives roadmap process. It seems that a natural progression of the RIF may be to take on a more formal role in prioritizing policy topics. PacifiCorp also believes that CAISO staff, or future RO staff, should also be heavily involved in the prioritization process. CAISO staff has access to more information on the market than what is available to market participants. The CAISO staff currently uses this information to bring inform their facilitation of the stakeholder process, and in PacifiCorp's view, this should continue. Staff also has more knowledge about the costs and timelines needed for implementation. While cost and implementations shouldn't dictate what policy gets discussed, they are important considerations.

2. Originating policy framing: who first presents a problem statement and solution range?

Stakeholders and CAISO staff should be able to present problem statements and solutions for consideration in the stakeholder process. PacifiCorp believes it then should be up to the original presenter, or group of interested parties, to convince stakeholders that their problem statement should be adopted for policy discussions.

3. Stakeholder-led workshops: who has responsibility for facilitating discussion and moving an agenda forward?

In PacifiCorp's opinion, CAISO staff, or the future RO staff, should be the facilitators of the discussions and moving a policy topic through the stakeholder process, as it is today. PacifiCorp finds the CAISO staff's expertise to be valuable in managing the stakeholder process.

4. Selectivity of bottoms-up stakeholdering: how often and (possibly) through what nomination process are topics subject to a stakeholder-driven process?

Policy that would require changes to market operations language in the CAISO or RO tariff should be subject to a stakeholder process that includes all market participants. PacifiCorp finds the current Business Manual Practice (BPM) change process sufficient for making BPM changes to reflect the tariff. For tariff changes that don't involve market operations, the decision whether to have a stakeholder process should be left to entities in the CAISO balancing area.

5. Sector definitions: Should sectors be established? If so, how should they be defined?

- **Should they be weighted for voting purposes? If so, how?**
- **What could be the value of sector designations outside of voting?**

PacifiCorp is not in favor of defining sectors to be used for binding voting. Opinions within sectors can be varied, which can lead to a sector's vote not representing some of the members of that sector. PacifiCorp is open to the governing body looking at indicative votes from participating entities within sectors to understand if there are any trends across sectors or other groups, like geographical regions.

Sectors may also be useful to develop problem statements collaboratively before seeking approval from the broader stakeholder community. Sectors can serve as a good place for market participants to understand the challenges others are facing in their sector to come up with problem statements that appeal to a wider audience.

6. Voting: Should stakeholder engagement include voting? If so,

- **What kind of issues are selected to be voted on?**
- **At what points in the process should voting be scheduled?**
- **Should voting be indicative or binding?**

PacifiCorp supports using indicative voting in the stakeholder process. It could be useful when determining whether a policy proposal is ready to be taken to the governing body for approval. Also, indicative voting could be helpful determining which topics to prioritize. Lastly, indicative voting could be a good way to determine when a stakeholder process is ready to move from the working group phase to the policy development phase.

7. Standing and ad hoc committee status: what sort of forums or committees do sectors use to organize themselves?

8. Do you have any additional feedback you would like to share with the Launch Committee on these topics?