CHAPTER 8: STAKEHOLDER PROCESS

A. Introduction

1. Proposed Action Plan

[To be added]

2. Background

The stakeholder process is the primary function through which the ROWE will exercise its independent authority over the market rules. Having an accessible, transparent, and efficient process is critical to the ROWE's success and for building credibility and trust across the stakeholder and regulatory community.

The Step 2 Final Proposal included a set of principles for the stakeholder process based on North American Electric Reliability Corporation (NERC) standards that the ROWE Board should consider as it is implementing the tools and process:

a. Openness – participation open to all persons;
b. Transparency – transparent to the public;
c. Consensus building – build and document consensus;
d. Fair balance of interests – not dominated by a small number of sectors, and respect for minority positions;
e. Due process – reasonable notice and opportunity to participate and to have views considered; and
f. Timeliness – getting things done, not bogged down in stalemates[1]
g. Efficiency
h. Cost minimization

This chapter builds on the recommendations in the Step 2 Final Proposal and includes more detail about how the various stakeholder process steps could work, including priorities for the ROWE Board to consider for an interim stakeholder process between now and when the ROWE has full authority, funding, and a formal stakeholder process in place.

NOTE: It is important to note that while "staff" will often be mentioned throughout the process, it is used generically and is not specific to ROWE or CAISO staff. In instances where CAISO staff does have a role, it will be under the direction of ROWE staff.

Capitalized terms correspond with defined terms within the EDAM tariff except as amended or superseded by the ROWE organizational documents or by any tariffs, policies or agreements adopted by the ROWE Board.

[1] NERC Rule of Practice 304(1)-(6) (effective November 28, 2023).

B. The Stakeholder Representative Committee

1. Overview

The Stakeholder Representative Committee (SRC) should be the primary stakeholder body that works with staff to catalog and prioritize initiatives, as well as to define initiative problem statements and solutions. The SRC is designed to promote compromise and collaboration within and across sectors on initiatives that will result in changes to the ROWE, market tariff, and services it oversees. SRC representatives should work directly with staff, stakeholders, and other SRC representatives to advise the timeline and process for stakeholder initiatives, identify emerging issues, and develop initiative framing and solution sets. The SRC does not have decision making authority and SRC representatives' primary responsibilities are facilitating and coordinating within their sectors and with other representatives. As described in the voting section, indicative voting is conducted at the individual entity level and the SRC does not vote. The SRC structure is designed to ensure adequate and diverse representation for the work that body is tasked with, putting more emphasis on individual entity votes than the sector-level positions.

The SRC should be committed to promoting access and transparency for stakeholders across the West. Meetings of the SRC should be open, except for litigation, personnel or proprietary/confidential/security-sensitive information. Meetings should be public, recorded, and available for remote participation.[2] The SRC sectors should be self-organized and SRC representatives should be selected by the organizations within each sector. If they so choose, sectors may develop criteria to establish diversity for their SRC representative(s) (e.g., geographic diversity, sector subgroups, etc.). SRC representatives should be responsible for maintaining regular communication with and fairly representing the input of stakeholder organizations within their sector.

The stakeholder process is imbued with the assumption that each entity and group of represented stakeholders participates in only one sector for indicative voting purposes. The ROWE Board should monitor and address any bad faith duplicate representation in various sectors via a strategic proliferation of such membership organizations for voting purposes. Multiple factors, including sector self-policing, tend to discourage this scenario, and this is an unlikely outcome. Nevertheless, the ROWE Board should be prepared to protect the integrity of stakeholder participation and intra-sector voting in this unlikely scenario by re-evaluating its rules regarding assumptions that stakeholders are represented by only one sector, including non-profit membership organization participation.

[2] Meetings convened by SRC representatives for the purpose of conducting organizational activities of the SRC may not be public.

2. Structure

The SRC should be composed of representatives from each of the 9 sectors for a total of 21 seats. The number of seats for each sector may evolve as market services at the ROWE evolve.[3]

	ROWE Sectors	Number of Seats on SRC
1	EDAM Entities	2 seats
2	WEIM Entities	3 seats
	[no PMA standalone sector]	*1 additional seat reserved for PMAs in either EDAM or WEIM sector, assuming the PMA is either a WEIM or EDAM Entity
3	ISO PTOs	2 seats
4	Non-IOU load serving entities serving load from WEIM or EDAM.	4 seats * if an entity participates collectively through an EDAM entity (e.g. BANC members), they cannot also participate in a different sector as individual entities (i.e., generators or munis)
5	PIOs	2 seats
6	Consumer advocates	2 seats
7	Large C&I customers	2 seats
8	IPPs, independent transmission developers, and marketers	3 seats
9	Distributed Energy Resources (including distributed generation, storage and demand response resources, aggregators, and enabling hardware and software providers)	1 seat
		Total: 21 seats on committee

To help manage the SRC, there should be an SRC Chair and Vice Chair role. The Chair and Vice-Chair will serve as the primary point of contact with the staff and provide administrative leadership for organizing the SRC. Otherwise, these roles are not intended to impart additional authority.The Chair and Vice-Chair roles should rotate on a yearly basis and be selected by the SRC, with each of the nine sectors casting a single vote (for those sectors who have more than

[3] For example, while the EDAM Entities have a single seat on the Regional Issues Forum today, by the time a stakeholder process is implemented, the number of utilities who have executed implementation agreements may have increased.

one seat, the seated members will work together to determine who casts the vote) for the Chair and Vice-Chair. The Chair and Vice-Chair should be from different sectors. In general, the Vice-Chair should be nominated for Chair the following year after performing the Vice-Chair role.

Each SRC representative should have one alternate to participate on behalf of that SRC representative when the primary representative is unable. This would help spread the burden of participation and enable sectors to have more consistent representation in the SRC efforts. It is the primary representative's responsibility to keep the alternate representative informed to enable meaningful participation.

3. **Sectors**

The purpose of sectors is to provide diverse perspectives and recommendations, while providing a structure for coordinated engagement among the organizations represented within each sector. Participation in a sector does not preclude participating as a stakeholder. All registered stakeholders, regardless of their sector participation, should be able to participate in the stakeholder process via comments, workshops, and indicative voting. For stakeholders who are not a member of a sector, their votes should not count toward a remand threshold but should be shared with the staff and Board for information only.

The sectors and number of representatives on the SRC should be assessed as a part of the re-evaluation of the stakeholder process after two years have elapsed of the ROWE being operational. In addition to assessing if representatives are able to dedicate adequate time to the SRC, the ROWE Board should evaluate whether the broader stakeholder community feels the process is sufficiently responsive and successful overall.

The following definitions were developed by the Launch Committee and are meant to provide additional clarity to help identify which sector different entities would fall within. The ROWE Board should revisit these definitions to facilitate participation as appropriate, including to specify tribal participation. Organizations may participate in a sector so long as they have an "active interest" (e.g.: serving load, owning generation, making purchases, representing customers) in the market within the WEIM and/or EDAM footprint.

EDAM Entities, as defined in the CAISO Tariff: Two SRC Representatives

- A Balancing Authority that represents one or more EDAM Transmission Service Providers and that enters into an EDAM Entity Agreement with the CAISO to enable the operation of the Day Ahead and Real-Time Markets in its Balancing Authority Area.
- EDAM Entities can be investor-owned utilities, federal power marketing agencies, or publicly owned utilities.

WEIM Entities, as defined in the CAISO Tariff: Three SRC Representatives

- A Balancing Authority that represents one or more WEIM Transmission Service Providers and that enters into a WEIM Entity Agreement with the CAISO to enable the operation of the RealTime Market in its Balancing Authority Area.
- WEIM Entities can be both investor-owned utilities, federal power marketing agencies, or publicly owned utilities.
- *There will be one additional seat in either the EDAM or WEIM Entities sector for a Federal Power Marketing Agency, assuming the PMA is either a WEIM or EDAM Entity.* If there are no PMAs in either the WEIM or EDAM, there will be no PMA seat on the SRC.

ISO Participating Transmission Owners: Two SRC representatives

- A party to the Transmission Control Agreement which has placed its transmission assets and Entitlements under the CAISO's Operational Control in accordance with the Transmission Control Agreement.
- ISO Participating Transmission Owners can be investor-owned utilities or publicly owned utilities.

Non-IOU load serving entities serving load from WEIM or EDAM: Four SRC Representatives

- Utilities or load serving entities located within the market footprint that are not included in another sector may include, but are not limited to public power, municipal utilities, cooperatives, or community choice aggregations. May include trade associations.
- If an entity participates collectively through an EDAM entity (e.g. BANC members), they cannot also participate in a different sector as individual entities (i.e., generators or munis). Participation through an EDAM entity is tied to the formal nature of this relationship and the relationship is meant to represent the interests of such entities. This role is different from merely being a customer or embedded entity within an EDAM entity where the EDAM entity is not formally representing the interests of that entity. Because this distinction may not always have a bright line, the sector is empowered to make a determination as to whether an entity falls under this category. This distinction is separate and different from trade association participation, which is discussed below.

Public Interest Organizations: Two SRC Representatives

- Public Interest Organizations are 501(c)(3) organizations that seek to influence market policy in favor of the general public or a broad segment of it, rather than focusing on the interests of its own members, and are actively involved in energy issues within the market footprint.

Consumer Advocates: Two SRC Representatives

- Consumer advocates from states with load in the market footprint that represent residential and small commercial end-use utility customers. This may include a representative from the Consumer Advocate Organization.

Large C&I Customers: Two SRC Representatives

- Large commercial and industrial customers with load in the market footprint. This may include trade associations.

Independent Power Producers, Independent Transmission Developers, and Power Marketers: Three SRC Representatives

- Organizations within the market footprint that have generation, transmission, or load but are not an electric utility, or organizations that engage in power marketing activities within the WEIM or EDAM footprint. This sector includes independent power producers, independent transmission developers, and power marketers. May include trade associations.

Distributed Energy Resources: One SRC Representative

- Companies that own, manage, or develop generation, storage, or demand response resources interconnected to the distribution grid (collectively referred to as Distributed Energy Resources or DERs), DER aggregators, and providers of enabling hardware and software that are active within the market footprint. May include trade associations.

a. CAISO BAA Sector Participation

The CAISO is partnering with the ROWE to consider how to appropriately represent the CAISO BAA and transmission operator role separate from its market operator role.

b. [HOLD: Other entities]

c. Trade Association Participation

Non-profit membership organizations (including trade associations) should be eligible to join an appropriate sector that is consistent with an association's membership and mission. Each sector may have the ability to designate a trade association to fill a seat on the SRC, if so desired.

If a non-profit membership organization (including a trade association) does not fall under the classification of any of the SRC sectors, it may still participate in the stakeholder process by attending and participating in all open and public meetings, submitting written comments, and having votes tabulated and provided to the ROWE Board (votes will be informational only).

4. SRC Representative Roles, Responsibilities, and Expectations

SRC representatives are primarily tasked with advising staff and communicating and engaging with the organizations within their sector. This document does not prescribe specific requirements for how the SRC should perform the responsibilities assigned to it, nor does it prescribe specific processes for the management of sector activities.

In general, the responsibilities of individuals serving in these roles are to provide advice and input and to facilitate and support the participation of stakeholders in the stakeholder process, both individually and at the sector level. As such, the expectation is that persons appointed to roles on the SRC and on any adjacent groups will be committed to supporting and facilitating the participation of the stakeholder community and its members in the stakeholder process, even if a given stakeholder's perspective or position does not necessarily align with the position of the SRC representative or appointee's position on an issue, the position of the representative's company, or the position of the representative's sector. *The SRC representatives should expect to participate in at least 80% of the meetings to ensure that there is full representation and an equal distribution of workload and responsibility across the SRC.*

It is difficult to estimate the amount of time that may be required of SRC representatives in carrying out these activities. Similarly, it is difficult to estimate the level of time commitment that would be required of the SRC or SRC representatives (or stakeholders) that are appointed to serve as Initiative Sponsors, because this approach is new and not particularly analogous to any process used currently in the CAISO. As the SRC is established, stakeholders should anticipate that the level of time commitment required to participate as an SRC representative may be significant and should consider if this level of commitment is in alignment with the desire for more stakeholder-driven processes.

5. Stakeholder Registration

There should be no fee for registration. Staff should establish a process for a stakeholder to modify or cancel their registration as appropriate. Registration should be renewed annually to ensure accurate registration information. Individual stakeholder organizations should be responsible for keeping their registration and contact information up to date. Stakeholders who elect not to agree to a code of conduct and registration could still participate and comment but would not be eligible to vote.

See Appendix ___ for a proposed Stakeholder Registration and Code of Conduct.

C. Stakeholder Process

1. Differences From the CAISO Stakeholder Process

To preserve lessons learned and efficiencies gained, the Launch Committee built on CAISO's existing stakeholder processes to develop the recommendations in the Step 2 Final Proposal that aim to elevate participation, enhance transparency, and foster collaboration in shaping the future of ROWE services. The following is a summary of the significant changes to the existing CAISO stakeholder process:

- SRC and elevated role for stakeholders
- Revision of existing sectors
- Indicative voting
- Catalog and Roadmap
    - Prioritization of initiatives will no longer take place in the Catalog, but will take place in the roadmap process
    - The SRC Roundtable's primary task will be to prioritize initiatives
    - ROWE Board vote
- Stakeholder Initiative Phase
    - Initiative sponsors
    - Formal workgroups
    - Potential for remand when an initiative is sent to the ROWE Board and significant opposition exists

The Stakeholder Process will consist of two elements: (1) Issue Identification & Prioritization: Catalog and Roadmap Development and (2) Stakeholder Initiative Phase.

Each year, the ROWE will commence a Catalog and Roadmap process that guides the development of new policy and/or modifications to existing policies. The Catalog will be a listing of stakeholder initiative proposals for potential inclusion in the Roadmap. The Roadmap will be a prioritization of submitted initiatives, and associated workplan, for included initiatives over a three-year period. Each document should be updated annually and will be voted on by the ROWE Board.

Initiatives within the final roadmap will then go through the Stakeholder Initiative Phase which will include problem statement development, straw proposal, draft proposal(s), a final proposal, and a vote by the ROWE Board. It is at this point that stakeholder initiatives will go from issue to solution and associated tariff change.

The below is intended as a guide for the initial Board to use when launching the stakeholder process. The initial Board is encouraged to utilize their discretion to act in the stakeholder process's best interest while upholding the aforementioned NERC principles.

D. Issue Identification and Prioritization: Catalog & Roadmap Development

Catalog and Roadmap development should include the following steps:

1. Kickoff Stakeholder Meeting
2. (Catalog Development) Initiative Proposal Submission
3. (Catalog Development) Sort and Classify Initiatives
4. (Catalog Development) Publish Catalog
5. (Catalog Development) Stakeholder workshop on Published Catalog
6. Publish Updated Market Policy Roadmap from previous year
7. (Roadmap Development) Prioritization
    a. SRC Roundtable and report
8. (Roadmap Development) Draft Roadmap Development
9. (Roadmap Development) Final Roadmap Development
10. (Roadmap Development) Indicative vote on Final Roadmap
11. ROWE Board Consideration

The ROWE should collaborate and work closely with Market Operator (MO) staff throughout the Roadmap and Catalog process to understand the MO's budget, technology, ability to implement, and workplan. This collaboration will help shape work early on and may establish realistic expectations around implementability and timeline. The Board should have the opportunity to check in with staff periodically in executive sessions on the progress of Catalog and Roadmap development. The collaboration with the MO is not meant to give the MO the ability to veto or stand in the way of proposed work coming out of initiatives, but to provide useful input in these early stages that can help shape and prioritize proposals.

1. **Kickoff Stakeholder Meeting**
   Timing: Mid-January

The Catalog and Roadmap process will begin with a "Kickoff Stakeholder Meeting" to gather stakeholders and prepare for the upcoming Catalog and Roadmap process. This meeting will include:

- An overview of the Catalog & Roadmap process including the scope and purpose of the Catalog and the Roadmap
- Goals for Catalog and Roadmap development
- A timeline for Catalog and Roadmap development
- An overview of Phase 2: The Stakeholder Initiative Phase
- To the extent practicable, expectations and resource availability for initiatives
- Next steps & Resources
    - Contact information, landing page, etc.

Staff Functions:

- Facilitation
- Administrative: developing materials for the meeting, noticing, scheduling
- Policy Lead: staff in charge of the Catalog and Roadmap process

2. **Issue Identification: Catalog Development**

Staff should conduct a process each year to identify initiatives for inclusion in the Catalog. Initiatives that have been proposed but not adopted should not be rolled over from year to year, but stakeholders can re-submit initiatives. Initiatives that were previously adopted but have been addressed or are no longer needed should be eliminated from the Catalog.

a. **Initiative Proposal Submission**

Timing: Mid-January - end of February

After the kickoff meeting, the ROWE should begin accepting proposals for initiatives to be included in the Catalog and Roadmap. Initiative proposals can be submitted by any stakeholder. However, if the CAISO is submitting a proposal, it needs to clarify what function it is submitting on behalf of (i.e. as market operator or balancing authority).

The proponent of the initiative should be the entity who drafts the proposal. Stakeholders may also work together to create joint proposals that could be submitted by/with the support of multiple entities.

The proposal submission process should be open to all stakeholders, and entail a standardized submission form on the ROWE website. The submission should be responsive to the following to the best of the stakeholder's understanding:

- Initiative title
- Has this issue been submitted to the CAISO before submission to the ROWE? If yes, please provide a reference. If no, why not?
- Has a substantially similar proposal been submitted to the ROWE before? If yes, please provide a reference. Please note any meaningful differences from the prior proposal.
- Proposed initiative description: discuss the scope of the proposed initiative. What specific elements of existing market design does your initiative propose to address?
- Categorization: please share a suggested classification (see below for descriptions of the classifications) for this initiative and your reasoning.
    - If the proposed classification is in Category 2: Compliance with State and Local Public Policy, include the state or local public policy or law that may require the tariff change and an evaluation of whether it would adversely impact other states.
- Market Impact: to the extent possible, discuss anticipated impacts to market efficiency or system reliability, as well as interactions with existing market products, policies, and procedures.
- Interdependencies: please share the effect this initiative may have on any previous or current initiatives.

- Timing and urgency: are there regulatory requirements that may impact the implementation timeline, or time-sensitive reliability impacts? Are there consequences to not addressing this issue?
- Data: identify existing data and missing data needed to analyze the issue and develop solutions.
- Implementation steps: What specific steps would the ROWE or CAISO have to take to implement the proposal. (optional)

Proposal submissions should be posted on the ROWE website. Staff will need to be able to understand how existing initiatives overlap and may consult with subject matter experts (SMEs) and other staff to assist in this effort.

Staff Functions:
● Administrative: point of contact for the commenting tool ● Policy Lead: available for questions ● Operations/IT: administering the comment tool ● SMEs on hand for consultation

b. Sort and Classify Initiatives

Timing: End of February - Mid-April

Stakeholder initiatives should be classified into three categories: Compliance/Non-Discretionary Initiatives, Compliance with State and Local Public Policy Initiatives, and Discretionary Initiatives. A description of each category is provided below.

At this stage, proposed initiatives should contain a suggested initiative classification from the proposer. Staff should review the suggested classifications, and should retain ultimate decision making authority on the final classification. Below are the three classifications with supporting definitions:

1. Compliance/Non-Discretionary initiatives: Initiatives that address compliance with federal policy (e.g. FERC order, FERC rulemaking, federal agency directive, etc.), a market design flaw, or an emerging reliability issue.
2. Compliance with State and Local Public Policy Initiatives: In some instances, a state or local policy or law may impact a market *participant* to the extent that a tariff change may be needed to enable that participant's compliance with state or local policy or law. In such an instance, any entity including a state agency representative, ROWE BOSR representative, or market participant who may be impacted may propose an initiative under this classification.
    - The Public Policy Committee of the ROWE Board will conduct outreach to states, local power authorities, federal Power Marketing administrations, and tribes to

gather input about whether those entities see potential adverse impacts to their policies. The definition of what constitutes "adverse impacts" will be determined by the Public Policy Committee.

- Staff will evaluate the proposal and determine whether a tariff or business practice change is required.
- Tariff change/no adverse impacts: If staff determines a tariff change is required and the Public Policy Committee receives feedback that there are no adverse impact concerns, including compliance, the initiative is treated the same as a Compliance/Non-Discretionary Initiative and will automatically be included in the Roadmap, with an evaluation of timing based on the compliance requirement.
  - The classification will be titled as "State and Local Public Policy - Compliance/Non-Discretionary."
- Tariff change/adverse impacts: If staff determines that a tariff change is required and the Public Policy Committee receives feedback that state or local policies could be adversely impacted, the initiative could still move forward through the stakeholder process and will be treated as a discretionary initiative.
  - Staff should include materials received on the potential adverse impacts in the Catalog.
  - The classification will be titled as "State and Local Public Policy - Discretionary."
- No Tariff Change: If staff determines that a tariff change is not necessary, they would document their findings and present them to stakeholders and the ROWE Board. Stakeholders including BOSR representatives could comment on this finding.

3. Discretionary Initiatives: Market improvements or evolution.
   - Emergent Operational Issues
     - Tariff changes addressing a market design flaw, reliability impairment, or matter affecting a particular set of entities (for example, a market design problem that undermines the reliability of a particular balancing authority area) but fall short of exigent circumstances.
     - These initiatives would still be required to have a stakeholder process, but they would be handled with a greater degree of urgency than a normal discretionary initiative lacking the same time pressure. (e.g., [Energy Storage Enhancements (ESE) stakeholder initiative])
   - Discrete: clear ideas to address known problem statements
     - May be able to move directly to the policy development stage (Stakeholder Initiative Phase, identified below) of the stakeholder process if the problem statement is adequately formulated (i.e. Inter-SC Trades in Regional Markets).

    - Conceptual: broad topics where many stakeholders agree there is an opportunity to improve the market, but there is no clear consensus on solutions or problem statements at the beginning of the initiative. This topic may need one or more working group discussions at the issue evaluation stage in order to determine scope and problem statements.
        - May include several subtopics
        - E.g., Energy Storage Enhancements, Greenhouse Gas Coordination, Gas Resource Management

Staff should be tasked with reviewing the submitted proposals to determine if the stakeholder process is the appropriate forum, or if the submission belongs in another process (i.e. business practice manual change process or customer inquiry, dispute and information process). For proposals that staff determine should not be included in the Catalog, staff should provide their reasoning and a recommendation on the appropriate forum. 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. Staff and the Board should have the discretion to determine the best process for addressing such concerns.

Staff Functions:

- Policy: (1-2) people with enough experience to appropriately sort & classify
- SMEs on hand for consultation
- Consultation on feasibility: IT, legal, operations

c. Publish Catalog

Timing: Mid-April

The Catalog will be a listing of proposals for stakeholder initiatives. Staff should write and publish the Catalog to the ROWE site which should include:

- All proposals submitted by stakeholders
- Staff categorization and reasoning for the assigned category if there is a discrepancy from what the stakeholder proposed
- Appendix of disposition of stakeholder initiatives: For initiatives that are recommended to not be included in the Catalog, this section should include staff's reasoning for the exclusion, how they will be addressed, and the appropriate forum for addressing them.
- Board classification

Staff should also include the status of current initiatives and their associated workplan. This workplan should include the timeline for completion, and the staff resource and capacity spent on these initiatives so that stakeholders have an understanding of available resources.

Staff Functions:

- Administrative: write, notice, & publish the Catalog
- Policy Lead: available for questions

d. Stakeholder Workshop on Published Catalog

Timing: End of April/Early May

Once the Catalog has been posted, staff should facilitate an educational stakeholder workshop that includes:

- Stakeholder presentations of their submitted initiatives
- Staff overview of the Catalog
    - This includes an overview of non-discretionary items that will automatically be included in the Roadmap.
- At the discretion of staff or if specifically requested by stakeholders, an update on initiatives currently underway
- Process for prioritization
- Communication of staff resource availability to the extent known (high level)
- Relevant topics as necessary
- Next steps, etc.

Staff Functions:

- Facilitation
- Administrative: developing materials for the meeting, noticing, scheduling
- Policy Lead: available for questions
- SMEs on hand for consultation

e. Publish Updated Roadmap from Previous Year

Timing: End of May

The Catalog and Roadmap process occurs annually. In between annual updates, staff need to ensure that the previous year's Roadmap is updated and reflects any changes that may have occurred since it was finalized. This process may result in an updated Roadmap that is intended to reflect any such changes to existing initiatives. An updated Roadmap will be published if there are changes that necessitate an update. It should be developed and published by staff and include the following:

- Any major or minor changes
- Status updates for initiatives, including whether prioritization has changed and, if so, why, and whether the SRC and ROWE Board has been notified.
- To the extent practicable, a broad understanding of resource/staffing changes

As stated under Board consideration of Catalog and Roadmap (see page __), in order to maintain flexibility and adaptability, staff should have the ability to modify the prioritization of initiatives in the Roadmap at any time, but must notify the ROWE Board and SRC promptly. This re-prioritization should also be added to the agenda of the next public meeting with an opportunity for public comment.

Staff Functions:

- Administrative: drafting, and noticing the publication of the document
- Policy Lead: available for questions, include designated policy lead for each initiative

3. Prioritization: Roadmap Development

Timing: May

The Roadmap should be a document that prioritizes the initiatives in the Catalog to reflect the workplan for stakeholder initiatives for a three-year period. Roadmap development includes the following steps:

1. SRC Roundtable
2. Prioritization of Catalog initiatives via survey by individual stakeholders and sectors
3. Draft Roadmap published for public comment
4. Stakeholder meeting
5. Stakeholder indicative vote on Draft Roadmap
6. Staff revises and publishes the Final Roadmap
7. Stakeholder indicative vote on Final Roadmap
8. Staff recommends Final Roadmap to ROWE Board, with results of stakeholder indicative vote

a. SRC Roundtable

Timing: May

After the publication of the Catalog, SRC Representatives should work with their sectors to collect feedback and rank initiatives that are of most importance to each sector. This process will be largely informal, and it will be up to each sector to determine the method with which they will rank initiatives. SRC representatives should take this information back to the SRC to identify common themes across sectors that are of the most importance to the stakeholder community as a whole.

Once SRC representatives collect feedback, they should host a roundtable and publish a report with recommendations to staff on initiative prioritization. The Roundtable should be developed and led solely by the SRC including materials, noticing, facilitation, and compiling feedback in the form of a report. All stakeholders are encouraged to attend.

The Roundtable should use the below agenda as a foundation:

- Themes of consensus/non-consensus identified by SRC representatives
- Consolidation of stakeholder opinions
- Highlight urgent issues
- Evaluation and prioritization of initiatives from the previous year's roadmap
- Feedback on the Stakeholder Process and for the ROWE: What is going well, what is not, opportunities for improvement, etc.

1. Report

The SRC should submit to staff a report that captures the dialogue and discussion of SRC representatives with their sectors and at the round table. The report should include the following information:

- Overarching themes and common priorities across sectors to consolidate the views of the stakeholder community as a whole
- For each sector, an overview and summary of their current priorities, new initiative priorities, other high priority issues, and feedback on the Catalog and Roadmap process.

The SRC should also attempt to organize these priorities based on discretionary initiative category—i.e., whether the initiative appears to be a "discrete" initiative, or a broader, "conceptual" initiative. Staff will use this report to inform development of the Roadmap.

Staff Functions: This should be developed and led solely by the SRC including materials, noticing, facilitation, and compiling feedback. ● Administrative: scheduling

b. Prioritization Survey
Timing: May - June

Stakeholders should be asked to prioritize only discretionary initiatives listed in the Catalog. Non-discretionary initiatives should be automatically included in the Roadmap.The SRC should take an active role in advising on the prioritization of discretionary stakeholder initiatives for purposes of the Roadmap (outlined below), but staff should retain primary responsibility for implementing a public stakeholder process to identify and prioritize initiatives. Stakeholders should retain primary responsibility for advancing initiatives that are important to their organizations. The SRC should facilitate and assist in these efforts, but it should not replace the roles and responsibilities of either staff or stakeholders.

Due to the evolving nature of proposal submissions and resource availability, it is critical that the ROWE maintains a flexible prioritization process. The ROWE may choose to utilize previous CAISO prioritization surveys as a foundation and it is likely that the process will continue to evolve as stakeholder proposals and needs evolve.

In lieu of a specific process for prioritization, the ROWE should design a process that ensures that the following information is obtained via a survey or similar questionnaire format:

- Which initiatives are the highest priority to individual stakeholders
- Which initiatives are urgent to individual stakeholders
- Stakeholder resource availability: Where and how much are stakeholders prepared to participate
- Reasoning: For stakeholders who wish to provide additional context to their responses, a mechanism for narrative feedback to state their reasoning. The intent is to gather information that may not be easily quantifiable.
- Classification: This may also be an opportunity for stakeholders to comment on the classification of initiatives and whether they disagree with staff's proposed classification and why.
- Feedback on how the ROWE can structure the process and provide additional support to enable robust participation in the Stakeholder Initiative Phase.

In advance of the initial prioritization process, the ROWE should identify a survey tool that is secure, flexible, and adequately meets the needs of this process. Responses should be automatically posted to the ROWE website. Staff should also provide analysis of the responses in the form of a heatmap or similar tool that displays where trends may lie.

Staff Functions:

- Facilitation
- Administrative: notice, develop, distribute, collect and post survey responses.
- Policy Lead: available for questions

c. Draft Roadmap Development

Timing: June - November

Staff should lead the drafting and development of the Roadmap. Staff should coordinate with the SRC prior to publication of the draft, revised, and/or final Roadmap to ensure that the Roadmap reflects the input of the stakeholder community as documented through the SRC's roundtable process and report and stakeholder comments submitted as part of the Catalog and Roadmap process. This coordination is not intended to supplant or displace public meetings or process for obtaining input from the stakeholder community at large through the stakeholder comment process on drafts or the final Roadmap, but it is intended to ensure alignment of the Roadmap with stakeholder priorities as the public process for Roadmap development proceeds. As part of this coordination process, staff may inform the SRC of the basis for its proposed decisions regarding Roadmap prioritization, including any relevant staff, budgetary, or software and other implementation constraints that might affect prioritization. The objective is that this collaborative process will result in a Roadmap that reflects the goals and priorities of stakeholders to the maximum extent possible given available resources to conduct initiatives for the three subsequent years.

As part of its evaluation of which discretionary initiatives to include in the Roadmap, staff may use as one criterion for inclusion whether an initiative is in the top 5-10 for at least two sectors. Staff may also include any initiative that is in the top 5-10 for any single sector with documentation on the value of the initiative.

The Draft Roadmap should include the following:

- For Initiatives included, the title of the initiative, organization that submitted the proposal, a short summary of the initiative, and the categorization of the initiative
    - Compliance/Non-Discretionary initiatives will automatically be included in the Roadmap. Staff should include any required timing.
    - Compliance with State/Local Public Policy: If a State and Local Public Policy Initiative is determined to require a tariff change, staff should include timing of the initiative which is based on the compliance timeline for the policy change
- Disposition of stakeholder initiatives: Why an initiative was not included in the Roadmap including staff evaluation of workload and resources availability.
- A report on the prioritization survey and sector prioritization that leverages the demographic information included in Stakeholder Registration to give insight into areas of consensus. This should include a summary of which sectors' priorities appear to be well represented relative to other sectors.
- A Roadmap in the form of a Gantt chart that delineates the proposed timeline for each initiative including adopted Roadmap initiatives from the previous year.

d. Stakeholder Meeting

Timing: November

Staff should lead a stakeholder meeting to review the Draft Roadmap, explain resource availability, and answer any questions. An open comment period and indicative vote should follow the meeting. All registered stakeholders should be eligible to vote and indicative voting results should be part of the recommendation to the ROWE Board.

At this time, staff may request that one or more representatives of the SRC present an overview of the results of the Roundtable and sector prioritization.

Staff Functions:

- Facilitation
- Administrative: Developing materials for the meeting, noticing, scheduling, administering the vote
- Policy Lead: Available for questions

- SMEs on hand for consultation
- Consultation on feasibility: IT, legal, operations

e. Final Roadmap Development

Timing: November - December

If applicable, staff should integrate stakeholder comments to develop the final roadmap which should contain the same elements of the Draft Roadmap. Staff should lead a stakeholder meeting to review the final roadmap. An open comment period and indicative vote should follow the meeting. All registered stakeholders should be eligible to vote and indicative voting results should be part of the recommendation to the ROWE Board.

Staff Functions:

- Facilitation
- Administrative: Developing materials for the meeting, noticing, scheduling
- Policy Lead: Available for questions
- SMEs on hand for consultation
- Consultation on feasibility: IT, legal, operations

4. Indicative vote on Final Roadmap

Timing: December

Once consensus has been achieved, staff should administer an indicative vote to recommend approval of the Roadmap. All registered stakeholders should be eligible to vote and indicative voting results should be part of the recommendation to the ROWE Board.

Staff Functions:

- Facilitation
- Administrative: Developing materials for the meeting, noticing, scheduling, administering the vote.
- Policy Lead: Available for questions
- SMEs on hand for consultation
- Consultation on feasibility: IT, legal, operations

E. Board Consideration of Catalog and Roadmap

Following completion of the Roadmap, the ROWE Board should formally vote to adopt the Catalog and Roadmap. Ahead of the vote, the ROWE Board should receive a packet of materials that includes:

- The finalized Catalog & Roadmap

- A report from the SRC on the process for developing the Catalog and Roadmap including all indicative voting and the results of the indicative vote on the final roadmap.
- Disposition of stakeholder initiatives
- Input from the Public Policy Committee as needed.

The Board vote should be held at the next public meeting of the ROWE Board.

Staff Functions: ● Facilitation ● Administrative: Developing materials for the meeting, noticing, scheduling ● The following should be on hand for any questions from the ROWE Board: Policy Lead, SMEs, IT, legal, operations, and SRC Representatives.

1. **Changes to the Roadmap after Board Vote**

In order to maintain flexibility and adaptability, staff should have the ability to modify the prioritization of initiatives in the Roadmap at any time, but should notify the ROWE Board and SRC at the next public meeting and take comments. For example, if a stakeholder-prioritized initiative needs to be removed from the Roadmap or an initiative's timing must be adjusted in a significant way (such as by deferring or advancing an initiative by a year or more), the expectation is that the SRC and the stakeholder community at large will be advised of the reason for the change. The SRC should also provide input to staff regarding emergent issues and would work with and advise staff regarding any needed reprioritization to address emergent issues and major changes to initiative timelines (like deferral of a topic into a future year, for example). This could include discrete initiatives with quick solutions that may emerge out of the Catalog cycle (e.g., Energy Storage Enhancements). The SRC should retain discretion to address any concerns with the reprioritization with staff and/or the ROWE Board as appropriate.

F. Stakeholder Initiative Phase

The Stakeholder Initiative Phase is where stakeholders develop solutions and produce a final proposal for individual initiatives within the final roadmap. The Stakeholder Initiative Phase should include the following steps:

1. Problem Statement Development
2. Straw Proposal Development
3. Draft Final Proposal Development
4. Final Proposal Development
5. ROWE Board Vote

1. Issue Evaluation: Problem Statement Development

The focus of Step 1 addresses the following question: What is the objective of the stakeholder initiative and what issues are we trying to solve?

The final problem statement should be narrowly tailored and create a shared understanding of the goals of the initiative prior to policy development. This will align stakeholder expectations on the goals and scope of the initiative.

The following two circumstances should result in an ability to bypass the development of the problem statement:

- An emergent operational issue exists that does not allow time for problem statement development (time is of the essence)
- A well-defined problem statement was included in the proposal (Catalog). If staff determines that a proposal includes a well-defined problem statement, they may hold an indicative vote to bypass problem statement development and move on to the straw proposal stage. If the indicative vote reflects stakeholder disagreement with the problem statement as written, the initiative should move to problem statement development.

If neither of these criteria are met:

- Problem statement development should be required

The problem statement should be drafted by staff. Staff should use the proposal submitted in the Catalog and Roadmap process as a foundation for drafting.

Once a problem statement has been drafted, staff should host at least one stakeholder meeting and subsequent comment period. Discretion should be given to staff to determine whether additional meetings and comment periods are needed. SRC members are expected to regularly solicit input from their sectors during problem statement development. The goal is to drive towards enough consensus to hold an indicative vote to approve the problem statement so that it can move to the policy development phase.

The SRC may identify initiative sponsors in the problem statement development phase. Additionally SRC, staff, and/or stakeholders may identify the need to convene a work group to work on specific elements of the initiative.

a. Role of Staff

Staff should retain primary responsibility for facilitation and administration of the problem statement development process, including technical expertise. Staff should ensure that problem statement development is aligned with the proposal description.

b. Role of the Initiative Sponsor

The SRC may identify up to two initiative sponsors for a stakeholder initiative. The sponsor is generally an entity who is strongly in support of a particular initiative moving forward and willing to dedicate additional time and effort to help drive the initiative. Sponsorship is not mandatory for all initiatives and ROWE staff may decide to proceed with an initiative without sponsorship.

An initiative sponsor is a voluntary role. Initiative sponsors are expected to partner with staff for the entirety of the stakeholder initiative phase. If possible, sponsors should cultivate participation from multiple sectors to drive consensus and meet the needs of a more diverse set of stakeholders. The initiative sponsor role should be flexible; it is intended to be adapted to the needs of an initiative and the sponsor's capacity. The Initiative Sponsor role may include, but is not limited to:

- Consulting on the initiative timeline
- Conducting outreach on the initiative with SRC representatives and their sectors
- Providing support to determine when problem statement development is complete and ready to move to an indicative vote
- Drafting problem statements, proposal materials, and materials for workshops
- Leading, organizing, participation in workshops

c. Work Groups

Staff, initiative sponsor(s), or SRC representatives should be able to request the creation of a work group. Flexibility on whether to form a work group should be maintained. A work group is a subgroup that meets to advance the development of a problem statement. Work groups should be open to all stakeholders, with the expectation that all work group members actively contribute. An example of when a work group may be needed is if problem statement development stalls and a small group effort would facilitate forward progress. The work group should determine when it is no longer needed and the timing for it to dissolve.

Staff should administer and support the work group, including taking the lead on preparing discussions. Initiative sponsors should partner with staff to support meeting preparations and facilitation of the work group. Stakeholders may also provide presentations and discussions on proposed problem statements as part of the work group.

d. Indicative Vote on Problem Statement

If staff, stakeholders, the initiative sponsor, or the SRC believe the problem statement is well defined and ready to move to the straw proposal stage (consensus exists and/or sufficient iterations and revisions have been made), they may call for an indicative vote at the stakeholder meeting on the problem statement. The call should be seconded by another entity for the vote to move forward.

Notice should be given to stakeholders in advance of a vote. A vote may be held to either advance or terminate an initiative/problem statement. Voting should be administered through the ROWE voting system and all registered stakeholders may vote.

An indicative vote should be held at the second publication of the problem statement(s) if one has not already been held to determine how and whether to proceed. If there are multiple problem statements, each may require a vote.

Results of an indicative vote may lead to:

- Reframing the issue
- Moving to the straw proposal phase
- Reconsideration of whether to proceed with initiative development

Ad hoc, informal voting may be used throughout the process to evaluate the level of consensus around problem statements.

Staff Functions:

- Facilitation: Leading meetings, working with initiative sponsors and work groups as needed, facilitating vote(s)
- Administrative: Developing materials, noticing, scheduling, managing comment tool.
- Policy Lead: Each initiative should have a designated policy lead.
- SMEs on hand for consultation
- Consultation on feasibility: IT, legal, operations

G. Policy Development: Identification of Solutions

1. Straw Proposal Development

Staff should generally lead the development of the straw proposal. However, in instances of discrete initiatives, the proponent of the initiative may offer a straw proposal for staff to use.

While there is not a specific role for SRC in the straw proposal phase, SRC representatives are expected to maintain communications with their sector and inform them of progress. Staff may use SRC representatives as points of contact to assess interest in participation. Initiative sponsors should be involved and consulted at each stage of straw proposal development, but are not expected to assist in facilitation of the process. Staff should provide initiative sponsor(s) guidance on any guardrails that may need to be considered (tariff/legal/operational constraints) when drafting the straw proposal.

Work group members from the problem statement development stage may opt to continue the work group into the straw proposal development phase. If an issue is critical to a single sector, they could offer to drive the work group to reduce staff burden. However, this approach may not work with an initiative that has diverse and divergent perspectives across sectors. It should be left to the discretion of staff, initiative sponsor(s), and workgroup members on how the workgroup is operated and when it is no longer needed.

Decisional classification: At this point, the straw proposal should include a recommended decisional classification (whether it falls under ROWE, CAISO, or Joint Authority). The method for determining this will be between the ROWE and CAISO and included in the CAISO-ROWE agreement.

a. Straw Proposal Stakeholder Process

The stakeholder process for straw proposal development should occur in the following order:

- (1) Release of Draft Straw Proposal
- (2) Stakeholder workshop on Draft Straw Proposal
- (3) Open comment period on Draft Straw Proposal
- (4) Revision of Draft Straw Proposal
- (5) Release of Revised Draft Straw Proposal
- (6) Stakeholder workshop on Revised Draft Straw Proposal
- (7) Open comment period on Revised Draft Straw Proposal
- If needed and as determined by staff, additional iterations of steps 4-7

Staff should lead the drafting and development of each iteration of the straw proposal and workshop materials, facilitate stakeholder workshops, develop questions for commentary, and work with stakeholders to integrate comments. Stakeholders may present associated proposals or comments at workshops as needed, at the discretion of staff. Staff may also invite external entities to present if they determine that it would be productive to the discussion. Materials and associated commenting tools should be posted publicly on the ROWE website.

b. Indicative Vote & Finalizing Straw Proposal Development

Staff should utilize the comment template to gauge stakeholder consensus. Staff should provide notice to stakeholders that a vote will take place at the next comment period. SRC representatives are expected to communicate to their sectors that a vote is forthcoming.

Along with results of the indicative vote, staff should consider the following factors when deciding whether the straw proposal is ready to move to the next stage: level of general stakeholder agreement based on comments and feedback from workshops; technical feasibility; how much additional analytical work might still need to be conducted; is the proposal consistent with existing market principles.

Staff Functions:

- Facilitation: Leading meetings, working with initiative sponsors and work groups as needed, facilitating vote(s)
- Administrative: Developing materials, noticing, scheduling, managing comment tool.
- Policy Lead: Each initiative should have a designated policy lead.
- SMEs on hand for consultation
- Consultation on feasibility: IT, legal, operations

2. Draft Final Proposal Development

Staff should lead the development of the draft final proposal. While there is not a specific role for SRC in the draft final proposal phase, SRC representatives are expected to maintain communications with their sector and inform them of progress. Initiative sponsor(s) should have no formal role at this stage, but may assist staff in encouraging participation and driving consensus.

As with straw proposal development, there should be a workshop on the draft final proposal and opportunity to comment. Additional workshops and comment periods may be necessary depending on the level of consensus.

Staff Functions:

- Facilitation: Leading meetings, working with Initiatives Sponsors and Work Groups as needed, facilitating vote(s)
- Administrative: Developing materials, noticing, scheduling, managing comment tool.
- Policy Lead: Each initiative should have a designated policy lead.
- SMEs on hand for consultation
- Consultation on feasibility: IT, legal, operations

a. Indicative Vote & Finalizing Draft Final Proposal Development

This process should be the same as what is used when finalizing the straw proposal. Staff should utilize the comment template to gauge stakeholder consensus. Staff should provide notice to stakeholders that a vote will take place at the next comment period. SRC representatives are expected to communicate to their sectors that a vote is forthcoming.

Along with results of the indicative vote, staff should consider the following factors when deciding whether the draft final proposal is ready to move to the next stage: level of general stakeholder agreement based on comments and feedback from workshops; technical feasibility has been checked; how much additional analytical work might still need to be conducted; is the proposal consistent with existing market principles.

3. Final Proposal Development

Development of the final proposal should largely follow the same process as the draft final proposal with a notable change in voting structure (see more below). Staff should lead the development of the final proposal. While there is not a specific role for SRC in the final proposal phase, SRC representatives are expected to maintain communications with their sector and inform them of progress. Initiative sponsor(s) should have no formal role at this stage, but may assist staff in encouraging participation and driving consensus.

As with straw proposal and draft final proposal development, there should be a workshop on the final proposal and opportunity to comment. Additional workshops and comment periods may be necessary depending on the level of consensus.

Staff Functions: ● Facilitation: Leading meetings, working with Initiatives Sponsors and Work Groups as needed, facilitating vote(s) ● Administrative: Developing materials, noticing, scheduling, managing comment tool. ● Policy Lead: Each initiative should have a designated policy lead. ● SME's on hand for consultation ● Consultation on feasibility: IT, legal, operations

a. Indicative Vote on the Final Proposal

See voting section below.

H. Board Consideration

Once an indicative vote on the final proposal is taken, it should proceed directly to the ROWE Board, regardless of the results of the vote. Staff should be tasked with assembling a package of materials to present to the Board that includes at a minimum, the following elements:

- Changes from straw proposal and if applicable, draft final proposal
- Stakeholder process including results of indicative votes
- Final proposal
- A tabulated report of the indicative vote on the final proposal. This includes information about stakeholder characteristics that are obtained from the stakeholder registration form.
- Decisional classification

If applicable, staff should also submit materials from the BOSR, DMM, MSC, and Market Expert. The SRC may provide reports or opinions to the ROWE Board at this time. These documents could include reporting and analysis of indicative voting results, summaries of stakeholder positions, identification of open or unresolved issues, and review of whether the outcome of the initiative adequately addressed the policy priorities of stakeholders as identified in the initiative prioritization process.

Staff should present the final proposal and package of materials to the Board. If a member of the SRC would like to present to the ROWE Board on a specific matter related to the Initiative, they may request to do so. An opportunity for public comment should be easily accessible and available.

The Board vote is binding and if approved, triggers subsequent tariff changes and FERC filings. If the Board does not approve the final proposal, it should be remanded to the stakeholder initiative phase for additional refinement.

I. Exigent circumstances

In real-time emergency conditions, CAISO staff should retain emergency operational authority. If a tariff change is necessary to address the emergency conditions (exigent circumstances), the ROWE Board may make a temporary tariff change to address the issue without a full stakeholder process. If a temporary tariff change is made under the exigent circumstances provisions, it will not have gone through a stakeholder process. These tariff provisions should undergo a subsequent stakeholder review if they are to become a permanent feature of the market. This review should kick off no later than 30 days after FERC approval and must be approved by the ROWE Board within 6 months. Alternatively, the ROWE Board can vote to extend the exigent tariff changes in 6 month increments to enable ongoing stakeholder development.

J. Voting Processes

1. Purpose

Indicative voting should be institutionalized as an important, regular part of the ROWE stakeholder process. This emphasis on voting is a subtle but fundamental reform intended to infuse more responsibility over market design decisions with stakeholders and, ideally, generate more stakeholder collaboration and clearer evidence of support for final market design decisions by the ROWE Board. This section of the Briefing Book lays out a recommendation about how to structure stakeholder voting, drawing on the Final Proposal and subsequent work group activity to refine that proposal.

Stakeholder voting in the ROWE should be advisory rather than binding. The term “indicative” is used to emphasize the nature of this advisory voting: it is intended to reveal preferences among stakeholders and sectors for the direction of a given initiative or issue, and to steer further stakeholder process accordingly. These votes will provide transparent, well-organized information to the ROWE Board, staff, SRC, BOSR, market operator, and other stakeholders. Only in the case of a vote on a final proposal the votes would also have a limited action-forcing procedural effect (remand) when significant opposition to the final proposal exists, subject to final ROWE Board oversight, as described below.

Indicative voting under the ROWE, as proposed here, should occur at the organizational level (i.e., individual registered entities), and votes of all organizations would then be reported. These individual votes should also be organized into and reported by sector, along with other key characteristics of the voters. A remand to the stakeholder process could occur if the vote on a final proposal indicates significant opposition and a need for more collaboration or deliberation to generate broader agreement.

Indicative voting should not be seen as a substitute for robust stakeholder comments and dialogue. While indicative voting helps identify general support or opposition to a proposal, stakeholder comments help shape and guide an initiative with more detail and context. Written comments provide the "why" behind a vote and help staff and the ROWE Board understand if a sector is opposed to the whole initiative or a specific component. Written comments should continue to be a critical source of guidance and direction from stakeholders to the ROWE on market evolution.

2. Structure

Indicative voting would take place at the individual registered entity level. To be able to vote, a stakeholder would have to register with the ROWE via a stakeholder registration form and agree to a code of conduct (see Appendix ___ for an example of a Stakeholder Registration and Code of Conduct). The Stakeholder Registration and Code of Conduct document is provided to the ROWE Board for consideration as a starting point. There may be additional stakeholder information that the ROWE Board may find relevant and want to collect throughout this process.[4]

Indicative voting processes should be automated and accommodate virtual voting to enable the maximum number of organizations to vote. Voting processes and tools should be managed by ROWE staff. Reported results of indicative votes should be made public, should identify the voting entity, and should be tabulated across different groups and sub-groups to convey more

[4] Stakeholders have expressed some concerns about gamesmanship and potential outcomes of duplicate voting in instances where individual organizations are members of or belong to other organizations registered with the ROWE (e.g., via membership associations, client entities, and affiliated entities under parent companies). Appendix ___ includes a certification of participation and Code of Conduct intended to mitigate potential gamesmanship. While this proposal is the result of a deliberate effort to prevent such gamesmanship throughout the stakeholder process, the ROWE Board should remain cognizant of the importance of transparency, respect, and inclusivity. In this regard, there may be a role for SRC Representatives to assist the Board in evaluating compliance with the Code of Conduct and monitoring potential gamesmanship. Stakeholders should be empowered to contact their SRC Representative with such concerns and to work with the broader SRC and ROWE Board to find appropriate solutions.

detailed information. Publicly available voting results allows entities to understand the perspectives of other stakeholders and promote collaboration through enhanced communication.[5]

Staff should be responsible for sharing appropriate background materials, hosting meetings, and providing appropriate links and reminders about the voting system to all stakeholders. Staff should ensure the votes are tallied and appropriately reported. SRC Representatives should maintain regular communication with their sector members and may supply additional information or context about individual votes within their sector during subsequent meetings of the SRC or ROWE.

All voting information, including the results of all indicative votes, should be reported to the ROWE Board, regardless of a voting entity's participation in a sector.

3. Voting Prior to a Final Proposal

As described above, indicative voting should be used throughout the stakeholder process *prior to a final proposal* to capture stakeholder sentiment, preference, and identify areas of potential disagreement, including within standing and term-limited work groups and task forces reporting back to the SRC or the ROWE Board. It is intended to help the ROWE Board make decisions independently and expediently by providing a comprehensive understanding of stakeholder sentiment throughout the process. It is not intended to institutionalize any particular level of consensus prior to the Board making a decision.

For purposes of indicative voting and advancing an initiative prior to a final proposal, the Board should consider relying on a somewhat looser indication of stakeholder sentiment and support than the formal mechanics of voting on a final proposal. For example, striving for consensus, defined as general agreement among stakeholders and a lack of significant objection, when feasible, would be a sensible objective set by the Board. A consensus standard would encourage collaboration and compromise. As an input toward that objective, multiple opportunities throughout the process would be available to stakeholders to express any concerns or opposition (workshops, comment periods, indicative voting), prior to a final proposal.

Consensus may not be possible in some cases. Thus a standard or a directive for advancing proposals that lack consensus will be needed. One option would be to empower the ROWE staff to exercise its best judgment in such scenarios, recognizing the formal voting mechanism that still awaits any final proposal. Other options could include mechanisms to encourage or require more stakeholdering in the event of widespread disagreement on a draft proposal, while avoiding over-complicating the stakeholdering process. Having somewhat nimble subgroups and SRC workshops has a value of its own.

---

[5] The Launch Committee reiterates the important role of such cross-tabulations to help reveal patterns of support and opposition beyond the sector silos.

Under the approach recommended here, each registered entity may cast a vote. For indicative voting throughout the stakeholder process, entities would choose from the following options:

- Support
- Support with Caveats
- Oppose
- Oppose with Caveats
- Abstain

4. Voting on a Final Proposal

Upon completion of a final proposal in the Stakeholder Initiative Phase, and before the ROWE Board votes, stakeholders would have the opportunity to vote on an initiative. The primary action-forcing effect (remand) of indicative voting (beyond the informational value of revealing stakeholders' preferences) should be limited to final proposals that are going to be advanced to the Board. Absent some kind of action-forcing effect like a remand, indicative votes would be only weakly advisory. The weaker the advisory nature of such votes, the less likely stakeholders are to actively participate and develop a position on a given initiative, much less drive stakeholder collaboration to find solutions. Thus indicative votes on final proposals should have "weight."

If the criteria for a "default" remand are met (described below), the final proposal would be remanded to address stakeholder concerns and achieve broader support before it advances to the ROWE Board, absent an overriding ROWE Board decision. The term "default" captures the idea that the consequence of significant stakeholder opposition (detailed below) is to return to the drawing board and rework a proposal to generate more buy-in. However, it bears repeating that a default remand is not a guaranteed outcome: the Board will always retain the final say about advancing an initiative or allowing a remand to take effect.

Voting with caveats is impractical for calculating remands at this phase of stakeholder voting. Consequently, voting entities would select from the following choices:

- Support
- Oppose
- Abstain

a. Remand

As described above, the goal of the remand process is to ensure that a stakeholder's vote has a meaningful (but not absolute) impact on the decision-making process of the ROWE as a whole, in particular when there is extensive or intensive disagreement. Given the structure and elements of the stakeholder process that foster collaboration and transparency including the SRC, indicative voting throughout the process, written comment opportunities, and others, it is highly unlikely that a final proposal will be presented with significant opposition. However, in those unlikely circumstances, the final proposal should, by default, be remanded to a prior stage of the stakeholder process in order to address stakeholder concerns and achieve broader support. However, if the ROWE Board determines that an initiative is time-critical, is an exigent circumstance or has significant impact on the justness and reasonableness of the overall market, or is needed to address particular circumstances of a market participant or group of participants, then the ROWE Board should have the opportunity to move an initiative forward despite stakeholder opposition.

In developing the default remand process, there was an effort to balance several elements:

- *Changes in the number of sectors*. The number of SRC sectors may grow (or possibly shrink) over time, including for purposes of discrete ROWE services.
- *Differences in the sector sizes and participation modes*. Sector sizes range from almost 100 to under 10 entities. The need to equitably identify and address support or opposition from each sector is an important principle. Some sectors are more naturally open-ended, likely to have new entrants, and likely to have stakeholders actively monitoring ROWE proceedings rather than actively voting. Other sectors have a more fixed sizes (e.g., following state boundaries). So long as each sector has a critical mass of actively engaging, collaborating, voting, and problem-solving entities, then the presence of more passive stakeholders who retain a rarely exercised option to vote will be unproblematic.
- *Low barriers to voting*. A strength of the ROWE is that registering to participate as an entity with the option to vote should be relatively easy. The number of potential voters may thus proliferate—an attraction of an open, relatively flat stakeholder process—but without being commensurate with the organizational or financial consequences of some market policy outcomes. Indeed, the consequences of some indicative votes may be quite adverse for some entities. It is therefore important that such stakeholders have some degree of procedural protection when they are strenuously opposed to a final proposal.

The remand mechanism should serve as a procedural check, offering a way to pause the process of advancing a market design initiative while still leaving the ROWE Board the ultimate authority to move forward at its discretion. Noting the various elements and a desire to create an appropriate stakeholdering balance, the ROWE Board should consider two standards for measuring whether significant opposition exists and thus a remand should be triggered. These are measurements applied to the indicative vote on a final proposal, not a separate process or kind of vote. If the indicative voting results do not meet the requirements of the Sector Majority Standard, staff should apply the Minority Sector Interest Standard. If the indicative voting results do not meet the requirements of the Minority Sector Interest Standard, there is no remand.

1. *Sector Majority Standard*

This remand hinges on a simple majoritarian approval (or disapproval). It is triggered by a majority of all sectors having a majority (50.1%) of voting entities within the sector opposed to a final proposal (i.e., if the SRC is composed of 9 sectors, as anticipated, then 5 sectors would be required for a majority). The steps in the process are as follows:

- *Determine whether a participation threshold has been met to establish a sector's formal position* (support/oppose).[6] A threshold of at least 20% of all registered entities within a sector voting either for or against a final proposal should be used (abstentions would not count toward this threshold). In addition, the actual number of voters should be no less than 2 or 3 votes. Falling below that voting threshold would leave an indeterminate or informal sector position, at least for purposes of triggering a default remand. In that case, individual votes would be still counted and reported, but they would not trigger a remand.
    - For example: if a sector has 100 registered entities, then 20 of those entities must vote to be able to record a sector position. This approach is consistent with how many professional associations, private cooperatives, and corporate shareholder meetings function.
    - For a smaller sector with, for example, only 5 members, 20% of 5 would be a single voter, which appears to be too small to be representative of a sector as a whole. Therefore, the Launch Committee recommends that a minimum of at least 2 or 3 votes be cast in the sector in order to qualify for triggering a default remand.
- *Register a sector's position* (support/oppose). Once a participation threshold is reached, then a majority of the actual voting members constitute the sector's position.
    - For example, if a sector has 100 registered entities and 20 entities vote with a position (support/oppose), 11 of those entities must vote to oppose a final proposal in order to register the sector's position as "oppose."
- *Calculate if there is significant opposition*. Upon completing a vote on a final proposal, a majority of the sectors must be registered as "opposed" for the initiative to be remanded by default (subject to the ROWE Board overriding this remand).
    - For example, with the current 9-sector structure of the SRC, 5 sectors must be registered as "opposed" to trigger a remand.
        - If only 8 sectors are able to pass the participation threshold, and 4 sectors oppose a final proposal, then it does not qualify for a remand, even if the 9^{th} sector (that did not pass the threshold) informally opposes the proposal.

---

[6] The term "quorum" is a familiar way to define a minimum number of eligible decisionmakers present in order for a body of such persons to conduct business. This Briefing Book instead recommends the term "participation threshold" because the limited action forced by such stakeholder votes is a remand—a negative, procedural action. There is no minimum number of voters needed to advance an initiative under this recommended approach, and thus the term quorum is inapt. This view is underscored by having a recommendation for two separate participation thresholds for the two different types of default remand.

That sector forfeited being counted toward the remand by not having enough registered entities engage.

2. *Minority Sector Interest Standard*

This method for measuring opposition is intended to provide additional procedural protections for what may be termed minority sector interests. The risk to a relatively small number of sectors with deep opposition to a given initiative to being overridden by a majority of stakeholders in support is real and inherent in any stakeholder-driven or stakeholder-informed organized market. This standard should be invoked rarely, and should therefore have more stringent standards than the Sector Majority, including a demonstration of "broad and deep opposition" to a final proposal. In order to trigger this remand, at least one-third of the SRC sectors would have to have supermajorities of voters opposed to a final proposal. The steps in the process are as follows:

- *Determine whether a "broad" participation threshold has been met to establish a sector's formal position* (support/oppose)."Broad" should be defined as the number of votes (support or oppose only) as a percentage of eligible voters in the sector. This number should be at least 50.1% of all eligible voters in the sector. This simple majority—within each sector—would be the participation threshold for this type of remand.
- *Determine whether there is "deep" opposition in the sector's position* (support/oppose). "Deep" should be defined as at least 70% of those actual votes are opposed. This figure is high but still within reach for large sectors.
    - Additionally, the Launch Committee recommends that a "floor" be used of at least 5 votes opposed in each of those sectors and at least 20 votes opposed across all sectors. These minimum numbers accomplish the same thing as the floor proposed in the Sector Majority Standard (2 or 3 votes opposed). The floors help avoid a hair trigger remand.[7]
        - For example, for a sector with 100 registered entities, 51 of them must vote with a position (support/oppose) to meet the broad requirement. To meet the depth requirement, 70% of those 51 voters must be opposed (36 votes). So, for a sector with 100 registered entities, *at least* 36 of those entities must vote in opposition, as a bare minimum.
        - For smaller sectors, there must be at least 5 votes in opposition. So in the instance of a sector that has 7 registered entities, 5 of them would need to be in opposition for their sector to be considered "significantly opposed."
- *Calculate if there is broad and deep opposition*. Upon completing a vote on a final proposal, a third of the sectors must be registered as "opposed" for the initiative to be remanded by default (subject to the ROWE Board overriding this remand).

[7] If the Board concludes that small vote counts within sectors are nonetheless unduly triggering default remands, then it should be prepared to adjust the vote floors up.

Put briefly, this remand would require that at least a third of sectors are both broadly and deeply opposed to a final proposal. To be clear, it would not matter if other sectors are unable to meet the participation threshold requirement. As long as the required number of sectors (at least one third) are significantly opposed, a default remand would be triggered (subject, as always, to a discretionary override by the Board).

3. Additional Considerations

Abstentions would not be counted as votes to measure significant opposition. Because votes on final proposals are anticipated to be open, virtual, multi-day affairs, rather than fixed meeting lengths in-person or on a hybrid basis, abstentions in this context should be tabulated but should not contribute to the participation threshold for each sector, nor to the measurement of opposition. Comments from stakeholders would be particularly valuable if an entity is abstaining in protest rather than because they either have no opinion or feel they lack the subject matter expertise to vote.

- For example, if a sector has 100 registered entities, 20 of them vote to abstain, and 10 vote with a position, only 10 votes would be counted for purposes of triggering a remand. In this case, only 10 votes would count toward the threshold, and the threshold would not be met for that sector (for either the Sector Majority Standard or Minority Sector Interest Standard).

It is incumbent upon the SRC to encourage sector participation and ensure that each sector is duly informed about the requirements to meet the remand triggers. Robust participation is essential to ensuring that sectors are not over- or under-represented.[8] If such cases do occur, the ROWE Board will always retain the discretion to electively override a default remand.

A remand to the stakeholder process could apply to a full initiative or part of the initiative if these are severable. Thus, if an initiative had multiple elements, staff would have the discretion about which level or group of elements on which to conduct voting. Voting could either be broken up into each element, or a vote could be taken on the overall initiative, and staff could determine which elements need further work based on written and verbal stakeholder comment.

4. Exceptions

Several exceptions should be built into this general model of default remands triggered by indicative voting on final proposals.

[8] It bears repeating that stakeholders who become registered entities and retain an option to vote may elect to merely monitor ROWE activities, and this is a valid participation mode, so long as that sector still has a constructive critical mass of participants that regularly vote and contribute to the stakeholder process.

Default remand override. The ROWE Board should adopt a procedure whereby it can intervene, if it so chooses, to consider whether to approve a final proposal, notwithstanding a default remand being triggered. If the Board believes an initiative is time-critical, is an exigent circumstance or has significant impact on the justness and reasonableness of the overall market, or is needed to address particular circumstances of a market participant or group of participants, they could continue with approval of an initiative forward despite stakeholder opposition. These circumstances may be identified by the ROWE Board itself, staff, the BOSR, DMM, MSC, or Market Expert. Such an override should be based on consideration of the ROWE Board's overall responsibility for the markets. The ROWE Board would have to provide an explanation for the decision, such as an identification of overriding concerns listed above.

One place to insert this step would be as an item on a consent agenda at the ROWE Board's next meeting. If the ROWE Board does not act to remove the item from the consent agenda and discuss or debate it on its regular agenda, then the remand would proceed (i.e., by default). But the ROWE Board would retain an opportunity after a default remand to intervene and decide to approve an initiative anyway, based on the considerations listed above in this section. Exercising such discretion to override stakeholder objections is an important part of the ROWE Board's independent authority to protect the integrity of the market and the public interest, but these situations should be rare.

Elective remand. If the criteria for the minority sector interest standard are not met, but staff is poised to make a recommendation or the ROWE Board is poised to make a decision that is counter to the recommendation from the stakeholder indicative vote, the ROWE Board or staff could elect to send the issue back to the stakeholder process to address the stakeholder concerns prior to outright rejection. One rationale, for example, could be that while a majority of sectors support a proposal, entities that identify with a particular geographic region indicate deep opposition, suggesting a potential acute impact in that region.

The different methods of remanding are a critical element for creating a stronger culture of responsiveness to stakeholders. The authority to trigger a remand would thus lie not just with stakeholders, but with both ROWE staff and the ROWE Board as well.

5. Future Considerations

The ROWE Board should treat this remand proposal as an initial approach to this process that should be reviewed along with the other elements of the stakeholder process at implementation and again after two years of ROWE operations. Such a review should consider whether gaming behavior or perverse outcomes have occurred that should lead to a change in voting and remand procedures.

K. Interim Stakeholder Process

The stakeholder process above reflects compromises on key elements and an effort to increase stakeholder accountability, leadership, and transparency by the expansion of sectors and the use of indicative voting to indicate stakeholder positions. These elements maintain inclusiveness and approachability by eschewing formal voting for an indicative voting process and including sectors that reflect a broad range of market and non-market participant interests.

The ROWE Board retains the authority, in consultation with the stakeholder community, to determine the details of any stakeholder process. The purpose of this section is to facilitate decisions and early adoption by the Board for an interim stakeholder process that may be used until permanent ROWE processes are established. We guide the Board to the principles agreed to by a diverse group of stakeholders to guide the development of the stakeholder process. [9]

These recommendations are intended to cover the period where the ROWE Board will be fully constituted, but will not yet assume authority over relevant aspects of the market design. At a minimum, we strongly urge the following core elements be included in any interim stakeholder process:

- The sector identification and sector-based participation are critical to any interim process. It is this foundation upon which the Step 2 Final Proposal recommendations were built. Furthermore, through the implementation phase of the Pathways Initiative to date, the sectors and stakeholders are already organized, willing, and eager to move forward and contribute. For example, sectors have already begun organizing toward the structure outlined in the Step 2 Final Proposal and the detailed proposal in this chapter. The nine ROWE sectors have been organized by designated points of contact, and those sectors have each selected representatives for the Nominating Committee. The ROWE Board should encourage continued participation of these sectors for the purposes of an interim stakeholder process. It is important that the sectors that have been identified and have been supporting the Pathways Initiative should be utilized in the interim stakeholder process. This both prepares the sectors to act as a stakeholder and communicates the Board’s intention to continue to engage these constituencies.

- Transparent opportunities for public comment. The Step 2 Final Proposal organizes stakeholders by sectors, but it is the direct participation by stakeholders and the opportunity for everyone to comment on proposals and vote directly as individual interests that is critical to success. Meaningful opportunities for public comment, including written comments, are critical to any interim process also.

---

[9] See, NERC standards listed at the beginning of this chapter.

As described earlier in this chapter, other components should be included in any interim process:

- Straw and draft proposals that articulate specific ideas to garner meaningful stakeholder feedback;
- Periodic workshops to educate and facilitate discussion options;
- Indicative voting which is intended to capture the views of sectors to inform Board decisions and is a core element of our recommendations for a more permanent ROWE stakeholder process.

Timing Considerations and Application of any Interim Process. As of the submission of this Briefing Book, the goal is to file the ROWE regulatory structure documents (potentially including a ROWE governance tariff, CAISO tariff changes, and a ROWE/CAISO agreement that addresses the number of issues on which the ROWE and CAISO must memorialize their mutual responsibilities and obligations) with FERC by May 2027 to meet a January 2028 date for the ROWE to have sole decisional authority over the Day Ahead and Real Time markets.

The ROWE will need to independently stakeholder the filing of a potential ROWE governance tariff. This interim process can, for example, be used to provide opportunities for review before filing at FERC. Additional issues specific only to the ROWE may also arise requiring use of an interim stakeholder process.

Stakeholders are optimistic about the potential value proposition for the ROWE to support additional regional services. The first such opportunity is likely the ongoing development of a resource adequacy program by a separate group of stakeholders. However, if a proposal for that new resource adequacy is presented to the ROWE Board, beginning to stakeholder this initiative without the full benefit of a developed ROWE Board, staff, and stakeholder process creates a challenge to be addressed.

The Stakeholder Process Work Group included a diverse group of stakeholders who worked collaboratively and made significant progress but could not make recommendations on some significant aspects of an interim stakeholder process for establishing new regional services. In determining a suitable interim stakeholder process, the ROWE Board should ensure the principles and practices outlined in the bylaws, the Step 2 Final Proposal, and these materials are honored and respected as part of adding a new and important regional service. If the ROWE Board chooses to advance a proposal for a new regional service before the ROWE's more permanent stakeholder process is established, we encourage the ROWE Board to continue this effort, including soliciting additional input from a diverse group of stakeholders in a transparent process, to ensure that interim stakeholder processes are well received and to build trust in the organization.

Until FERC approval of governance and tariff changes, the CAISO will still have authority over the markets under the Primary Authority model articulated in the Pathways Step 1 proposal and memorialized in CAISO documents, where the WEM Governing Body has primary authority over certain Day Ahead and Real Time market issues. The CAISO will manage any stakeholder processes relevant to those markets.

Looking Forward: Future Independent Stakeholder Process Considerations
The ROWE Board will be charged with implementing a permanent stakeholder process. The Board should work toward having the full stakeholder process in place by 2028. Full implementation of the stakeholder process will require the ROWE to establish and procure the following resources:

- Staffing
    - Administrative: scheduling, noticing, management of registration, stakeholders, and voting tool
    - Facilitation: leading meetings, developing materials, coordinating stakeholders and SRC
    - Subject matter expertise
    - IT support
    - Operations support
    - Stakeholder process manager/staff: point of contact for stakeholders and the SRC, ROWE Board, and lead for policy development
- Tools, including
    - Mechanism for registering entities
    - Tracking and managing stakeholder information
    - Voting mechanism
    - Public commenting tool

The ROWE Board should consider staffing options to run the interim stakeholder process such as hiring outside consultants, contracting with the CAISO, acceleration of hiring stakeholder staff, or a combination of these.

When evaluating how and when to implement these resources, and the extent to which components may be implemented during the interim stakeholder process, the ROWE Board should keep in mind *cost, feasibility, efficiency, and durability.* Noting that the ROWE will have a limited budget, the ROWE Board should consider options that do not overly burden the ROWE or detract from other essential implementation activities. Thus, they should consider how to optimize and enhance existing structures and choose durable solutions that can transition beyond the interim period to the formal stakeholder process to minimize duplication.

L. Regional Issues Forum

1. Transition to SRC

[HOLD]

2. Introduction & Background

The CAISO currently has the Regional Issues Forum (RIF).
The RIF is a stakeholder-led advisory organization for discussion of issues and topics related to the western energy markets. It provides a forum for addressing specifics of WEIM or EDAM operations which is organized by liaisons from seven stakeholder sectors that facilitate input and participation from their respective sectors on relevant topics. The RIF will continue to function as they do today until the ROWE receives authority over the markets in early 2028.

The RIF organizes public meetings, held three times a year, which allow stakeholders to discuss broad issues related to western energy markets. The first meeting, held in March, provides stakeholder views on the CAISO Policy Roadmap. The meetings are open to the public and those interested are encouraged to attend and participate. The liaisons may also produce documents or opinions for the benefit of the WEM Governing Body, CAISO Board of Governors, and CAISO staff. More information on the RIF Operating Guidelines can be found on the CAISO RIF website.[10]

3. Enhancements Project

In preparation for the initiation of the SRC, the RIF began an enhancements project to evolve certain RIF processes and pilot new processes that aligned with the roles of the SRC as envisioned in the Step 2 Final Proposal. Along with the enhancements project, and at the request of WEM GB members, RIF liaisons created a transition plan detailing key steps, deliverables, and criteria for updating the RIF's structural responsibilities and current capabilities to align with the future SRC.

The RIF coordinated its efforts with parties that are expected to be affected by the changes that are under consideration in this effort, including members of the RIF, the Pathways Launch Committee, Formation Committee, and Stakeholder Process Working Group. The RIF Enhancements currently underway include:

- Enhanced role in the CAISO's Catalog & Roadmap Process
    - Expand RIF's role from an advisory function to greater engagement with CAISO staff to support identification of discretionary issues for the CAISO Policy Initiatives Catalog.
    - Align RIF responsibilities with the SRC, creating continuity in how issues are surfaced and prioritized.
    - Use a structured roundtable process to review, assess, and organize sector submittals.

[10] https://www.westernenergymarkets.com/documents/operating-guidelines-wem-regional-issues-forum.pdf

- Indicative voting on the Draft Roadmap
- Sector (Initiative) Sponsor Role: Pilot the sponsor role in a future initiative using an initial set of guidelines to structure the role.
    - The RIF does not have a specific initiative at this point, but is actively working with CAISO staff to identify a pilot initiative for 2027.
    - When the RIF and the CAISO decide to start the pilot:
        - RIF liaisons will work with their sectors to communicate the selection of sponsors
        - The RIF and the CAISO will develop meeting cadences with sponsors
- Indicative Voting: Registered stakeholders will vote through the initiative comment tool and results will be posted at the initiative website.
    - Pilot Initiative: EDAM Congestion Revenue Allocation Phase 2
    - Following the pilot, the RIF expects that indicative voting will be included in all initiatives where the WEM Governing Body has Primary Authority

The RIF is currently focusing on implementing these enhancements and will continue to meet with ROWE to collaborate on RIF Enhancements and plan the transition of the RIF to the SRC. In collaboration with Pathways, the RIF is working on a transition timeline to enable a smooth SRC launch.

INSERT TIMELINE

APPENDIX ____

ROWE STAKEHOLDER REGISTRATION AND CODE OF CONDUCT

Registration will be renewed annually to ensure accurate registration information. Individual stakeholder organizations are responsible for keeping their registration and contact information up to date. Disputes regarding sector assignments will be reviewed by the SRC. Stakeholders who elect not to agree to a code of conduct and registration could still participate and comment but would not be eligible to vote.

I. Organizational Information:
    A. Organization Name:
    B. Main Office Address:
    C. Main Office Telephone Number:
    D. Website:
    E. Description of Organization (Corporation, Nonprofit, Utility, public entity, etc):
    F. Geographic Area of Operation

        1. Northwest, California, Southwest, Intermountain West, multiple):
    G. Generation owning (yes/no):
    H. Load-serving (yes/no):
        1. If yes, please provide all time peak MW
    I. Is the organization an affiliate of any other registered stakeholder?
        1. If yes, please indicate the name of the parent company. For purposes of clarity, “affiliates” as used here do not include trade associations or membership in combinations of organizations such as power pools, joint powers authorities, or cooperatives.
        2. It has been suggested that entities list member organizations that they belong to in the interests of transparency and additional insight. The Board should explore the best way to collect and manage such information.

II. Authorized Representative:
    A. Primary Contact:
        1. Name:
        2. Title:
        3. Telephone Number:
        4. Email Address:
        5. Company
    A. Secondary Contact:
        1. Name:
        2. Title:
        3. Telephone Number:
        4. Email Address:

III. Sector Participation

Please indicate which sector you are registering with, sector definitions are found at ___. Please provide a brief statement as to why your organization qualifies for the sector chosen.

- EDAM Entities
- WEIM Entities
- ISO PTOs
- Non-IOU load serving entities serving load from WEIM or EDAM
- PIOs
- Consumer Advocates
- Large C&I Customers
- IPPs, independent transmission developers, and marketers
- Distributed Energy Resources (including distributed generation, storage and demand response resources, aggregators, and enabling hardware and software providers)
- None

Please indicate if this is a:

- New stakeholder registration
- Request to update contact information/authorized representative or

- Cancellation of an existing registration.

What It Means to Be a Recognized Stakeholder

The ROWE is a 501(c)(3) which offers all interested persons the ability to participate in the stakeholder process; anyone interested in the ROWE is considered a stakeholder and may participate in open meetings and submit comments. Stakeholders that wish to participate must complete the Stakeholder Registration and agree to the Code of Conduct. Registration is also required to cast indicative votes, or to participate in stakeholder standing committees of the SRC. Full details on the operation of the stakeholder process and governance structure can be found in the ROWE bylaws.

Stakeholders that are not members of a sector. Stakeholders that do not qualify as members of a sector may still register as a stakeholder and are encouraged to do so. However, any indicative vote will not count toward a remand threshold but will be shared with the staff and ROWE Board for information only. This group of stakeholders may participate in the stakeholder process and submit comments that will be included in the package of information that goes to the staff and/or Board when appropriate.

Participation Expectations for Recognized Stakeholders

Bylaws

Recognized stakeholders who share interest in and support the purposes of ROWE may participate in the stakeholder process as long as they abide by ROWE bylaws and other policies, rules, and regulations as adopted through the stakeholder process.

Public Meetings and Anti-Trust

Meetings may not be recorded or transcribed, including the use of any artificial intelligence tools, software, or applications to perform such tasks, without notice to all parties attending and consent from those parties. Members of the media are required to announce their attendance at the beginning of meetings but are not permitted to take part in discussions and should direct questions to ROWE Media Relations. Participants must identify themselves and the organization they are participating on behalf of, so all participants are aware of their presence and on whose behalf they are participating.

It is policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, and terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

A similar admonition applies to FERC Standards of Conduct. Participation in meetings is mixed and includes marketing function employees; please refrain from divulging non-public generation or transmission information.

Dispute process for sector membership

Sectors are self-organizing and therefore determine their own membership. If there is a dispute whether an organization belongs in a sector, the concerned entity may bring the issue to the SRC. The SRC should do its best to find the appropriate sector, and in the case of further disagreement, the issue may go to the ROWE Board for review.

Termination and Suspension

The ROWE Board should explore a process for terminating and/or suspending stakeholders for failure to meet the Participation Expectations or Code of Conduct outlined.

CODE OF CONDUCT

To foster productive, respectful, and inclusive stakeholder engagement, we encourage participants to observe the following best practices:

Engage with professionalism. Support a collaborative environment by communicating courteously and respectfully. Avoid any behavior or language that could be interpreted as hostile, discriminatory, or demeaning.

Approach issues with a solutions mindset. Participate constructively by identifying challenges and offering thoughtful, practical ideas. Ask questions, share observations, and stay curious. Aim to help move conversations forward.

Support broad participation. Encourage input from all stakeholder groups and help ensure a variety of perspectives are welcomed and respected. Value the diverse expertise and experiences present in the process.

Be familiar with the process. Arrive with an understanding of how the stakeholder process works, including its stages and decision-making points. The ROWE provides resources to assist stakeholders, such as the Office of Public Participation. Raise topics when they are most relevant, and use the appropriate venues to share concerns or ideas. Meetings are the primary space for constructive dialogue and solution-oriented conversation.

Prepare ahead of time. Review meeting materials in advance so you can contribute meaningfully and engage in informed discussion.

Honor the agenda. Stay focused on the scheduled topics to help ensure time is used effectively and all planned items are able to receive attention.

Recognize the nature of draft materials. Materials shared during meetings may be preliminary and intended to spark discussion. Treat them as working documents meant to gather input and evolve.

Express your viewpoint clearly. Explain your position and reasoning rather than assuming others already understand your background or perspective. Clear, well-supported contributions strengthen shared understanding and dialogue.

Uphold integrity and transparency. Communicate honestly and accurately with ROWE and fellow stakeholders. Do not alter data, misrepresent information, or engage in deceptive practices. Disclose any personal, financial, or professional interests that could influence your participation.

Follow through on commitments. If you agree to provide feedback, information, or materials, do so promptly to help maintain progress and accountability.