

January 12, 2023

**Western Freedom Comments on the West-Wide Governance Pathway Initiative
Initial Evaluation Framework for Pathways Options**

Western Freedom appreciates the opportunity to offer comments on the West-Wide Governance Pathways Initiative's (Pathways) December 15th paper presenting an Initial Evaluation Framework and Pathway Options. Western Freedom represents a broad coalition of large commercial and industrial customers working with key stakeholders to promote the benefits of a more affordable, reliable and cleaner energy future made possible through a western regional transmission organization (RTO).

As co-chair of the Pathways Initiative Launch Committee, I have been encouraged by the broad participation and intentional engagement that has led to the creation of the Initial Evaluation Framework and Pathways Options. We commend the substantial progress made since the [initial comment period](#) in September 2023. It is clear that the Launch Committee has incorporated feedback to ensure transparency and opportunities for wide ranging stakeholder participation, and thoughtfully considered diverse western perspectives when developing the Options and scoping the legal analysis.

Western Freedom supports governance solutions that enable the largest possible market footprint with the lowest consumer costs. Through our participation in the Launch Committee and specifically the Functions & Scoping Workgroup, we have seen these Options evolve through the Workgroup's deliberate and thorough discussions. As a result, Western Freedom supports the exploration of a multi-step process with a commitment to creation of an independent regional organization. This could increase confidence in utilities evaluating day ahead market participation within existing participation timelines, and maintain western market momentum. In addition, we expect that the legal analysis that the Launch Committee will obtain will provide necessary guidance on the feasibility and implementation of the Options. Western Freedom encourages the Launch Committee to continue at an expedient pace to determine the best path forward and take necessary steps to demonstrate meaningful progress.

Western Freedom also echoes comments submitted by the Clean Energy Buyers Association (CEBA) and supported by Ceres. CEBA and Ceres also represent large commercial and industrial customers and are aligned in support of the goal to maximize overall consumer benefits and establish independent governance in future offerings. Western Freedom is encouraged by the thoughtfulness and progression of the Pathways Initiative and looks forward to further contributing to this initiative.

Kathleen Staks
Western Freedom Executive Director
West-Wide Governance Pathways Initiative Launch Committee Co-Chair