

May 8, 2024

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Co-Chairs, Launch Committee
West-Wide Governance Pathways Initiative
Via email: Comments@WestWidePathwaysInitiative.org

Comments on the April 10, 2024 proposals of the West-Wide Governance Pathways Initiative Launch Committee (Launch Committee)

From: Signatories of the July 14, 2023, letter to Western Interstate Energy Board (WIEB) and the Committee on Regional Electric Power Cooperation (CREPC) leadership

To: West-wide Governance Pathways Initiative Launch Committee

We write today to thank you for the materials posted April 10, 2024 describing the next steps toward creating an independent governance regional entity, with the potential to operate west-wide, including across California.

In drafting the July 14, 2023 letter to WIEB and CREPC leadership, we called for a process to establish an entity that could encompass as large of a footprint in the Western Interconnection as possible, that would include California, and that would establish independent regional governance that could provide a broad range of market services including assumption over the Western Energy Imbalance Market (WEIM) and Extended Day-Ahead Market (EDAM). At the time, we understood that this was a first of its kind effort that would require extraordinary leadership from a variety of stakeholders across the West. We are encouraged by the outstanding levels of participation the Launch Committee has attracted and are pleased with the process established by the Launch Committee to develop practical solutions. While we do not have representatives that formally sit on the Launch Committee as voting members, we have provided three delegates and three alternates to engage and comment on Launch Committee activities and proposals. We are pleased with how our opinions, as well as those of other stakeholder sectors, are sought as the Launch Committee considers options and establishes its preferred proposals.

The Launch Committee has developed a “Step One” proposal released on April 10, 2024, which we believe is an important step, while further consideration on founding an independent regional entity continues. We understand that formally proposing a “Step One” proposal, that has been approved by the Launch Committee, to the California Independent System Operator (CAISO) Board of Governors and WEIM Governing Body is a next step, and that further consideration of the “Step One” proposal could happen in the CAISO stakeholder process across the coming months.

We appreciate that forward progress is being made with the “Step One” proposal and recognize that there is much work that remains on developing a “Step Two” proposal. We

are supportive of the process the Launch Committee has initiated to further develop and refine these options.

We are pleased that the Launch Committee has demonstrated a commitment to build on the preferred independent governance pathway options, informed by the thoughtful consideration of stakeholder input received as part of this comment opportunity. We believe that further developing these options will provide important momentum as the entity is formed.

We look forward to continuing to provide input on your proposals as they develop in the coming months.

Sincerely,

/s/ David Danner

David Danner, Chair
Washington Utilities and Transportation
Commission

/s/ Alice Reynolds

Alice Reynolds, President
California Public Utilities Commission

/s/ Ann Rendahl

Ann Rendahl, Commissioner
Washington Utilities and Transportation
Commission

/s/ Siva Gunda

Siva Gunda, Vice Chair
California Energy Commission

/s/ Milt Doumit

Milt Doumit, Commissioner
Washington Utilities and Transportation
Commission

/s/ Kevin Thompson

Kevin Thompson, Commissioner
Arizona Corporation Commission

/s/ Letha Tawney

Letha Tawney, Commissioner
Oregon Public Utility Commission

/s/ Pat O'Connell

Pat O'Connell, Chair
New Mexico Public Regulation
Commission