



651 Commerce Drive
Roseville, CA 95678

(916) 781-3636

www.ncpa.com

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West-Wide Governance Pathways Initiative
Stakeholder Process Work Group
comments@westwidepathwaysinitiative.org

SUBJECT: ROWE Stakeholder Process

Dear Stakeholder Process Work Group :

The Northern California Power Agency (NCPA) appreciates the opportunity to comment on the ROWE Stakeholder Process, provided for comment through July 10, 2026. We also commend the work of the Stakeholder Process Work Group in developing the detailed structure for stakeholder participation in the initiative process for the ROWE. The draft provides a structure and timeline for evaluation of initiatives and lays out the responsibilities of the various parties in the process whether that is ROWE, ROWE staff, Stakeholder Review Committee (SRC) or stakeholders. The process establishes a predictable progression that supports transparency and opportunity for participation.

We support the proposal but note the ROWE Stakeholder Process will require a significant commitment from ROWE staff, stakeholders and SRC. The resource and time commitment required could favor larger commercial entities as opposed to smaller public entities like NCPA, so we specifically appreciate the attention to the principle of a fair balance of interests and the goal of not allowing the stakeholder process to be dominated by a small number of sectors.

Finally, we appreciate the additional effort by the subgroup of the Stakeholder Process Workgroup focused on initiatives with significant opposition as some initiatives may be controversial and not lend themselves to consensus.

Sincerely,

JANE LUCKHARDT
General Counsel
(916) 781-4268