

Elliot E. Mainzer
President & Chief Executive Officer

Transmitted Electronically

September 4, 2026

Kathleen Staks
President, ROWE Formation Board & Co-Chair, Pathways Launch Committee
West-Wide Governance Pathways Initiative
Comments@WestWidePathwaysInitiative.org

RE: PATHWAYS INITIATIVE – Draft Briefing Book

Dear Ms. Staks,

The California Independent System Operator (CAISO) submits these comments in response to the Formation Committee's request for stakeholder feedback on its draft Briefing Book for the incoming Board of the Regional Organization for Western Energy (ROWE).

We commend the Pathways Initiative for bringing together stakeholders from across the West over the last several years and for the tremendous investment of time, effort, and collaboration that have made this milestone possible. The development of these materials represents the culmination of thousands of hours of work and will undoubtedly provide valuable context and input to the ROWE Board as it begins its service.

The establishment of the ROWE as an independent, regional governance organization is a significant achievement and reflects the collaborative efforts of stakeholders across the West to develop a durable governance framework for regional energy markets. From the earliest stages of the Pathways Initiative, CAISO staff have made themselves available to provide technical expertise, operational insights, and other assistance to support the initiative. As the ROWE transitions from formation to implementation under its permanent Board, we look forward to a productive working relationship with the organization and its leadership.

As ROWE's formation continues, we will continue to work closely with stakeholders and the ROWE to ensure that the requirements of Assembly Bill (AB) 825 are met. AB 825 provides the statutory authority for CAISO to transfer governance authority and for California's state regulated load-serving entities to participate in markets governed by ROWE. The implementation of the steps outlined in AB 825 is advancing in parallel to the formation of the ROWE. Together, these efforts demonstrate the region's commitment to moving from concept to execution and provide a strong foundation for independent governance of the regional energy markets.

As implementation efforts advance, CAISO is excited to engage with the ROWE Board and its staff to establish a durable institutional partnership to support the ROWE's mission and to maximize depth and liquidity across the largest possible market footprint. Collaboration between

the CAISO and ROWE, informed by a transparent and inclusive stakeholder process, will be critical to successfully implementing this new governance framework. CAISO also looks forward to establishing a contractual agreement that clearly defines the roles, responsibilities, and relationship of the two organizations to deliver technical excellence in regional market operations under independent governance. This will enable the two organizations to provide stability, transparency and predictability to meet the evolving needs of stakeholders across the West for many years to come.

Thank you again for your leadership and dedication throughout the Pathways Initiative. As the ROWE begins its new journey, we look forward to supporting the shared vision that will deliver lasting benefits to electricity consumers across the West.

Sincerely,

A handwritten signature in black ink, appearing to read "Elliot Mainzer".

Elliot Mainzer
President and Chief Executive Officer