



August 13, 2024

Comments to Pathways Initiative Launch Committee

Re: Regional Organization stakeholder process input, sectors and voting

Interwest Energy Alliance members include the leading renewable energy developers working with national non-governmental conservation organizations to expand the renewable energy markets throughout the Intermountain and Southwestern states, Colorado, Wyoming, Utah, Nevada, Arizona, and New Mexico. Interwest's members have participated in decision-making processes across the country and have played a key role in reforming these programs when opportunities arise, by incorporating best practices to enable representation of the interests of independent generation and storage owners, developers and operators.

Sectors. Interwest promotes decision-making designed to encourage collaboration, by incentivizing compromise and focused input collected by stakeholders with same or similar interests. A sector-based stakeholder process can help condense a multitude of voices into a chorus. This coordination can enable decision-makers to better understand the message, increasing efficiency and helping to prevent confusion and undue delays.

At the same time, sectors should be formed in a way that is granular enough so that the larger, more well-resourced stakeholders do not drown out minority voices. Diverse input inspires innovation, and gathers perspectives which can help identify weaknesses and fatal flaws in a proposal which may not be apparent to a wider group. Therefore, disparate interests should not be forced to only speak through a larger group. The CAISO RIF, for example, includes both independent power producers and power marketers, which could have different interests. If it is found that there are competing priorities or conflicts, these members could be divided to enable each group to speak independently. Some fluidity between and among sectors should be allowed when the sector's purpose is to submit comments. Moving towards a voting process will require more analysis of the formation of sectors. Notably, the Markets+ development process is still reviewing its sector makeup and will likely undergo some transformation. Interwest recommends that the Regional Organization be allowed to review and potentially further reform the stakeholder process after a period of operation, such as two years after initiating its independent governance over the markets.

Voting. Consistent with the foregoing, Interwest supports development of a more objective, transparent, structured methodology for reporting input and positions between and among stakeholders. Transparency in the form of taking indicative votes submitted on behalf of individuals or sectors representing groups of stakeholders can help inform both the board and other stakeholders about the relative priorities for issues, providing an important educational function. A indicative or advisory, informal voting process in the initial stages of discussion can help educate stakeholders and decision-makers about priorities and the reasoning behind positions taken by each sector. This process, along with setting aside time for discussion before and after initial votes are



taken if there are negative indicative votes, could help move from initial contemplation of a wider set of issues towards more focused, informed decision-making. Inclusion of a binding voting process is more complicated and therefore is not recommended at this time, because of the inability to fully address questions resolving assurance that all voices are represented fairly. Further changes can be made if the Regional Organization governing board deems appropriate based on stakeholder input received after it is seated and governing the markets as contemplated herein.

Interwest sincerely appreciates the opportunity to submit these comments.

Interwest Energy Alliance

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