



September 18, 2025

Via E-Mail: Comments@WestWidePathwaysInitiative.org

West-Wide Governance Pathways Initiative

RE: Wyoming Energy Authority Comments on Regional Organization for Western Energy Draft Bylaws

The Wyoming Energy Authority (WEA), Wyoming's energy office and transmission and pipeline authority, appreciates the opportunity to comment on the Regional Organization for Western Energy (ROWE) draft bylaws. The WEA also appreciates the Pathways Initiatives' concerted efforts at emphasizing state policy priorities, market independence, transparency, and collaboration. As such, to further enhance structures that foster a fair, transparent, and efficient electricity market that benefits all stakeholders and respects state policy priorities in the Western Interconnection, the WEA offers the proposed comments below and corresponding red-line version of the draft bylaws.

The WEA's comments focus on Article IV "Public Interest." Please note proposed new section 4.1.2. The WEA believes that explicitly stating that the Board of Directors is required to consult with the BOSR on tariff changes that materially affect State policy, significant resource adequacy, or market structure impacts, will highlight the BOSR's critical role in advising the Board on significant policy decisions as well as emphasizing the importance of each state's perspectives on market design changes that could affect state policy priorities.

Furthermore, please note the addition of proposed Section 4.1.7. The WEA believes that the language included in the "Placeholder for Market Monitoring and Market Expert," should specifically require a review and calculation of the economic impacts of state policy priorities. The WEA proposed language states: "The Market Monitoring function shall include review of economic impacts of State policies and shall report findings directly to both the Board and the BOSR. All analysis as a part of this impact study for any Tariff change shall be made publicly available on the corporation's website." The WEA believes that this revision promotes transparency, trust, and ensures all information is on file in the public sphere.

The WEA also proposes a minor revision to Section 4.2 "State Policies." The WEA suggests adding, "And do not unduly burden or prevent," in order to strengthen the importance of market design not infringing on state policy priorities.

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Last, throughout the draft proposed bylaws, the WEA encourages the explicit mention of, “State energy offices or their equivalents,” including membership on the proposed Public Policy Committee (Section 4.1.4 and Section 8.5), as well as in the Availability of Information Section 10.2.2. State energy offices across the West play a vital and increasingly important role in advancing state energy policy, advising and monitoring market design, and growing energy-focused economic development opportunities. The WEA feels strongly that, where appropriate, state energy offices should be specifically included as an identified stakeholder.

In conclusion, the WEA appreciates the opportunity to submit comments on the Regional Organization for Western Energy Draft Bylaws. However, the WEA does wish to emphasize that despite the stated intentions of the ROWE to respect state energy policies, we believe that in practice, this will be extremely difficult to achieve without stronger, clearer, and more enforceable commitments in the bylaws themselves. State energy policy is not an advisory or peripheral matter. It is foundational to how markets in the Western Interconnection must function and is foundational to good governance principles. Without strengthened provisions, there is a serious risk that market design and governance principles will infringe on state policy priorities, erode transparency, and undermine public trust. All western states, including Wyoming, have unique and widely varying policy priorities and economic development goals that must be protected. We emphasize the importance of ensuring that Wyoming's energy policies are fully respected and equitably treated in the Western Market operated by the California Independent System Operator (CAISO).

The WEA looks forward to further stakeholder engagement opportunities to work constructively in order to ensure that any regional organization is built on principles of fairness, transparency, and respect for state authority.

Sincerely,

Rob Creager
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Wyoming Energy Authority

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