

July 11, 2025

VIA E-MAIL ([Comments@WestWidePathwaysInitiative.org](mailto:Comments@WestWidePathwaysInitiative.org))

West-Wide Governance Pathways Initiative

**Re: California Large Energy Consumers Association Comments on RO Pathways Nominating Committee Process**

Dear Sir or Madam:

CLECA generally supports the Nominating Committee Process as revised, but, as discussed on the stakeholder call on June 27, 2025, CLECA has two suggestions to further improve the Nominating Committee Process.

First, the Executive Search Criteria in Section 3.5 for the Electric Industry should be expanded to refer to market participants, in addition to utilities, power reliability council executives, military officers, and academics. CLECA understands inclusion of the reference to former utility executives and executives of firms that perform professional services for utilities as potential nominees due the expertise brought by the individuals. However, there are benefits for additional consideration of present and former executives of electric market participants or executives from firms that perform professional services for electric market participants. In broadening the scope of expertise to include individuals from market participants, the Board stands to benefit from the knowledge and experience brought by a professionally diverse Board.

- Adding *“and former electric market participant senior executives, so long as these former executives are”* after *“electric utility senior executives”* and before *“currently unaffiliated”* and adding *“or electric market participants”* to the end of *“present or former executives of firms that perform professional services for utilities”* accomplishes this suggested change, as shown below.
- Electric Industry - such as former electric utility senior executives *and former electric market participant senior executives, so long as these former executives are* currently unaffiliated with any market participant or stakeholder, as described below; present or former executives of electric power reliability councils or power pools; retired military officers with relevant experience; or present or former executives of firms that perform professional services for utilities *or electric market participants*; or academics or consultants with expertise in electric utility issues.

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • California Steel Industries, Inc. • CalPortland Company • CEMEX • Kinder Morgan • Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation • National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. • UNACEM North America – Tehachapi Cement

1107 9<sup>th</sup> Street, Suite 1011, Sacramento, CA 95814, (916) 447-9884

Having representation from the electric industry expertise on the RO Board would be beneficial, and the executive search process warrants a more expansive criteria to ensure industry representatives are not limited to utility executives but also encompasses market participant executives.

Second, the Approval of Nominees in Section 3.6 should be revised to ensure stakeholders and interested parties understand that written input is not limited to letters of support. Rather, in addition to letters of recommendation supporting either the entire slate or individual candidates, letters of concern regarding either the entire slate or individual candidates may also be submitted. Revising the sentence as follows would accomplish this recommendation:

- “Individual stakeholders may submit ~~letters of recommendation~~ to the RO Board *letters of recommendation* supporting either the entire slate or individual candidates, *letters of criticism opposing either the entire slate or individual candidates, or both.*”

With regard to the approval of nominees, it is important to have a wholesome conversation about nominees, their strengths and weaknesses; allowing submission of letters opposing a nominee or an entire slate is important to enable a balanced process. Ensuring awareness that written input from stakeholders is not limited to letters of support should encourage sectors to have robust conversations about the nominees; CLECA’s recommended change would avoid the risk of chilling debate or fulsome discussions regarding potential limitations of candidates or concerns regarding the slate.

Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • California Steel Industries, Inc. • CalPortland Company • CEMEX • Kinder Morgan • Linde Inc. • Lineage Logistics • Messer North America, Inc. • Mitsubishi Cement Corporation • National Cement Company • Pacific Steel Group • Specialty Minerals, Inc. • UNACEM North America – Tehachapi Cement

## CONCLUSION

CLECA appreciates the opportunity to submit these comments.

Sincerely,

BUCHALTER, A Professional Corporation



Nora Sheriff  
425 Market Street, 29th Floor  
San Francisco, CA 94105-2491  
415.227.3551 office  
nsheriff@buchalter.com

Counsel for California Large Energy Consumers  
Association



HARPER ADVISORY LLC



Sam Harper  
9002 Six Pines Drive  
Shenandoah, TX 77380  
(214) 463-9423  
Sam@harper.energy

Consultant to the California Large Energy  
Consumers Association



Airgas USA, LLC • Air Products and Chemicals, Inc. • Anheuser-Busch • California Steel Industries, Inc. •  
CalPortland Company • CEMEX • Kinder Morgan • Linde Inc. • Lineage Logistics • Messer North  
America, Inc. • Mitsubishi Cement Corporation • National Cement Company • Pacific Steel Group •  
Specialty Minerals, Inc. • UNACEM North America – Tehachapi Cement

1107 9<sup>th</sup> Street, Suite 1011, Sacramento, CA 95814, (916) 447-9884