

January 12, 2023

Re: Comments on the West-Wide Governance Pathway Initiative Initial Evaluation Framework for Pathways Options

Ceres appreciates the opportunity to offer these comments on the West-Wide Governance Pathway Initiative's (WWGPI)'s paper presenting an Initial Evaluation Framework and Pathway Options¹ (December 2023). [Ceres](#) is a sustainability non-profit that advocates in collaboration with major businesses across the U.S. to advance climate solutions, protect water resources, accelerate sustainable capital markets, and build a just and inclusive economy. Through our Business for Innovative Climate and Energy Policy (BICEP) Network and the [Energy Optimization Working Group](#), Ceres brings together major employers, energy users, service providers, and manufacturers to advocate for energy policies that reduce utility costs, create jobs, strengthen the economy, and build healthier communities.

Ceres works across Western states to build political support and drive state action for the development of well-designed wholesale energy markets and a [Western RTO](#). Businesses in our network operate across the West and see the critical value of energy regionalization in lowering energy costs, improving reliability, and increasing access to renewable energy sources. Ceres is joined by Western Freedom and the Clean Energy Buyers Association, who also represent large commercial and industrial customers and are aligned in our support for WWGPI's mission² to maximize overall consumer benefits and establish independent governance in future offerings, among other goals.

Ceres echoes comments submitted by the Clean Energy Buyers Association which commend the WWGPI for providing inclusive and transparent stakeholder outreach. We also thank the Launch Committee for their continued hard work on this Initiative and for seeking input early on, before proposing specific strategies. Ceres agrees that the bookends for structural options are reasonably defined, however, additional options within the bookends may warrant exploration. Finally, we encourage the Launch Committee to prioritize clear timelines and consider whether a phased approach may be needed to achieve the Initiative's goals.

Ceres and other large energy customers are pleased to see continued momentum from this Initiative and look forward to future analysis and progress on structural options and future timelines. Continued engagement with large energy customers in the process is essential to ensure the best outcome for all energy customers and maximize societal, economic, and environmental benefits.

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¹ Pathways Initiative: Initial Evaluation Framework for Pathways Options, December 15, 2023.
<https://www.westernenergyboard.org/wp-content/uploads/Pathways-Initiative-Initial-Options-Evaluation-Framework-Paper.pdf>

² Mission and Charter of the West-Wide Governance Pathways Initiative (WWGPI) Launch Committee November 13, 2023.
<https://www.westernenergyboard.org/wp-content/uploads/Pathways-Initiative-Mission-and-Charter-November-13-2023-Final.pdf>