



West Wide Governance Pathway Initiative

Comments Submitted by PNGC Power, an Oregon-based electric generation and transmission cooperative owned by 16 Northwest electric distribution cooperative utilities with service territory in 7 Western states.

- 1. The design of Phase 1 is being facilitated outside of any existing organization or decision-making process. What pros and cons do you see to continuing this approach in Phase 1? If you see challenges inherent in this approach, what solutions do you recommend?**

We support the approach to draft the overview document released August 29th outside of an existing organization and decision-making process. Now that the overview document has been released and Phase I design activities are commencing to develop a charter and identify a Founding Board, we encourage expansion of the current coalition members to include broader industry sector representation. This includes entities with an interest in exploring pathways to an RTO, including strong representation from the Northwest region, including BPA's public power customers that explicitly and clearly support forming an RTO as an end state.

- 2. What is most important to you about the structure and process for Phase 1? What solutions would you propose to address your structure and process-related priorities for Phase 1?**

We understand the goal of Phase I is to produce a charter to guide the operation of the independent entity, including milestones and a timeline; identify founding board members; and establish the new non-profit entity. We encourage the West Wide Governance Pathway Initiative facilitators to expand participation beyond the group of state regulators to include varied entities that support a fully functioning RTO as an end state. It will be important for the facilitators to host an open stakeholder meeting prior to kicking off the Phase I process to discuss the purpose and expectations for participating in the Founding Board group and clearly identify those stakeholders that support developing an RTO as an end state and those stakeholders that are opposed.

For those stakeholders that are supportive and want to participate in the Phase 1 charter development efforts, we encourage the West Wide Governance Pathway Initiative coalition to ask for financial and resource commitments from all participating members of the Founding Board to ensure that they are fully committed to the effort and that they are not just attending to express opposition and slow down the process. This commitment should be significant enough to weed out those who are not motivated to support successful implementation of an RTO, but reasonable enough that organizations of varying sizes can participate. We also encourage the coalition to have representation from a broad array of industry sectors on the Founding Board and to identify representatives that are senior-level decision makers within their organizations to help the process move faster.

3. What do you like about the brief description of the Phase 1 scope and what would you change in the Phase 1 scope? Please provide your reasoning for any changes you propose.

The Phase I scope to develop a charter and identify Founding Board members by January 2024 is the right focus. We support an aggressive timeline so long as we encourage the West Wide Governance pathway coalition to issue an invitation to all stakeholders to participate in Phase I design efforts, but require commitment of financial and/or human resources as a requirement of being a Founding Board member. This approach will ensure that only entities that are serious about supporting an RTO end state are participating on the Founding Board. We also encourage a clearly defined decision-making process, including approach to voting, and not allowing Phase I decisions to be made other than by Founding Board members that have committed financial and/or human resources.

**4. What stakeholder engagement model do you believe is best suited to simultaneously enable:
a. broad stakeholder involvement in Phase 1 and future phases; and b. an ability to efficiently move through the work that must be completed in each of those phases?**

We support a model where the Founding Board develops Phase I materials as a smaller group and then shares the materials for review and comment during larger stakeholder meetings. We encourage frequent all stakeholder meetings as an opportunity for the Founding board to present and obtain feedback on the Phase I deliverables, including scope, timeline, charter and other content produced by the Founding Board. We also encourage the Founding Board to think about creating advisory committees that will support the Founding Board to prepare technical and other analysis as other avenues of participation for stakeholders that want to engage with the RTO pathways effort. For example, the establishment of a transmission cost allocation committee, governance committee, legal committee, and communications and outreach committee.

Thank you for the opportunity to provide comments. Please contact Connor Reiten, Vice President, Government Affairs at creiten@pngcpower.com or 503-310-4831 or with any questions.