



1/12/2024

**To:** Comments@WestWidePathwaysInitiative.org

**From:** Tucson Electric Power

**RE:** Comments on the Pathways Initiative Initial Evaluation Framework for Pathways Options

Tucson Electric Power (TEP) appreciates the opportunity to comment on the Pathways Initiative Initial Evaluation Framework for Pathways Options Paper. TEP looks forward to participating in this regional effort. TEP prioritizes an Independent & Transparent Structure upon which this Pathway should be built on to ensure fair and equitable outcomes for all participants. TEP is also aligned with the Desert Southwest Entities and fully supportive of comments provided by Salt River Project (SRP) & Arizona Public Service (APS).

With regards to the Initial Options Paper, TEP believes Option 4 would prioritize this independent framework with Full 205 rights, market operations, and market governance rules. TEP recommends the Pathway Initiative Launch Committee focus its efforts on this Option 4.