

Western Consumer Advocate Comment Re: WWGPI Public Interest Workgroup

The Western Consumer Advocates including California Public Advocates Office, Colorado Office of Utility Consumer Advocate, Nevada Office of the Attorney General Bureau of Consumer Protection, Oregon Citizens' Utility Board, Utah Office of Consumer Services, and Wyoming Office of Consumer Advocate provide the following comments on question five related to Consumer Advocates. These comments are intended to supplement the individual and joint comments that have been submitted separately by some of the signatories.

Each of our offices is the statutorily designated consumer advocate for our state. Collectively we serve an important role in protecting utility consumers in the West and are an integral part of our respective states' energy and utility policy. Thus to truly respect state policies, one of the stated objectives of the Pathways Initiative, the RO must contain a role for state-designated consumer advocates. Additionally, in order to fulfill its public interest objective, the RO board must be able to hear our voices separate from other sectors. While individual Consumer Advocates may differ on some details of the Pathways proposal, we stand aligned in our support for the creation of a Consumer Advocate organization to facilitate our participation in the RO as further explained below.

Question 5.a. *Do you agree with the structure proposed by the working group? Do you think this is an effective means of engaging consumer advocates? Why or why not? Please share your rationale.*

We generally agree on the structure proposed by the working group. Specifically, we support creating a 501(c)(3) organization to facilitate the participation of Consumer Advocates in the RO. The role of this organization would be to serve as a liaison between individual state-designated consumer advocates and the RO, convene and coordinate the consumer advocate members, as well as assist with general information sharing and support for advancing our collective positions.

The proposal is incomplete, however, in that it does not specifically address funding mechanisms. The Consumer Advocates strongly believe that success of a Consumer Advocate organization requires a durable, tariffed-based funding mechanism.

Question 5.b. *Do you think this proposal is effective in protecting the consumer interest? Why or why not? Please share your rationale.*

The proposal is a necessary step in protecting consumer interest but is not sufficient by itself. To ensure the consumer interest is protected, the RO proposal must also include a well-designed stakeholder process, board selection process, and independent market monitor. Individual Consumer Advocates will provide additional comments on these related issues.