



West-Wide Governance Pathways Initiative

Stakeholder Comment Template: Stakeholder Process

The Launch Committee has identified several specific areas that would be valuable to receive input to help refine this area of the Step 2 Proposal. All feedback is welcome, but responses to the following questions would be particularly helpful:

Workshop #2 Topic: How could issues and solutions before the Regional Organization (RO) get raised? Who leads?

Salt River Project Agricultural Improvement and Power District (SRP) appreciates the opportunity to provide comments to the Pathways Initiative. SRP believes any entity participating in the market should be able to nominate or frame a policy issue for discussion or consideration by the larger body. Stakeholders should have direct input into issue prioritization of discreet, non-mandatory issues, with the ultimate priority of issues decided by RO staff. Prioritization should take place in a transparent manner, and Staff should be required to identify a timeline of when issues will be heard. Minority opinions should also be noted for the record. RO Staff should provide justification for prioritization and address stakeholder feedback. These issues should be remanded to a relevant interim committee/working group/task force which reports to a central standing committee and is designed to develop a solution for proposal to the RO Board or equivalent deciding body. Staff and stakeholder participants both should be involved in developing and moving forward an agenda on given issues, though Staff should bear more responsibility regarding administrative items including keeping minutes, drafting agendas, setting up meetings and assuring timelines are met. Additionally, appeals and minority views should be recorded and shared with the RO staff and vertical governance structure, including as part of the final recommendation to the final deciding body.

Workshop #3 Topic: What could a sector-based committee and voting structure add?

SRP supports the establishment of sectors but stresses the importance of striking a proper balance between establishing an adequate number of sectors without being overly granular. SRP suggests the following five sectors for consideration and believes that having more than five sectors can become administratively burdensome and could lead to greater discord rather than building consensus within the proposed sectors: Public Power, Investor-Owned Utilities (IOU), Independent Power Producers (IPPs), Statutory Entities, and an “Independent” sector which includes those entities which do not fit in the other sectors. SRP also suggests the group should consider what the process should look like for the nomination of new sectors, the minimum criteria that should be set, and any possible implications it may have for the voting rights of other sectors.

SRP believes voting should occur at the following critical junctures in the stakeholder process: 1) at the working group level to confirm the issue framing, 2) at the working group level to approve a draft policy solution for consideration at the standing committee, 3) at the standing committee, where sector representatives would vote to give a final recommendation to the final deciding body.

SRP also supports sector weighted voting. Sector weighted voting also provides certainty to market participants which are load serving entities that are responsible for reliability that their voices will be heard on relevant market matters.

General feedback:

SRP continues to prioritize the following factors when evaluating the governance model in any new regional market in which it contemplates participation:

1. Independence / transparency;
2. public power representation;
3. local resource decision-making; and
4. utility input on grid operations.

Written comments are due on August 16, 2024. Please submit comments via email to Comments@WestWidePathwaysInitiative.org. Thank you in advance for your time and feedback. We look forward to receiving your comments and ideas.