

To: West-Wide Governance Pathways Initiative

From: Utah Office of Consumer Services

Re: Stakeholder Comment on the Public Interest Workshop Issues

The Utah Office of Consumer Services offers the following comments in response to the Public Interest Workshop questions.

1. Do you think the set of tools shared by the working group is comprehensive? If not, please share other tools that should be considered.

No comment at this time.

2. Do you disagree with any of the tools shared by the working group? Are there any that should not be used to protect the public interest? If so, please share your rationale.

We have no specific disagreements but believe that some of the mentioned tools need additional analysis and/or justification.

3. Do you agree with the tools shared to protect the public interest within the RO board? Do you have additional recommendations for consideration?

No specific comment at this time.

4. States Committee

a. Do you agree with the structure and governance proposed by the working group? Why or why not? Do you have additional recommendations for consideration?

The Utah OCS generally agree with the proposal but recommend that it be revisited if the scope of the RO is significantly changed in Phase 3 toward an RTO or to include additional functions.

b. How has your experience been with other markets' States Committees (BOSR, COSR, MSC, etc.)? Are there any considerations recommended for this working group?

No comment at this time.

c. Do you agree with the role of public power/PMA proposed by the working group? Do you have additional recommendations for consideration?

The Utah OCS believes that public power liaisons should be included only to the extent necessary to ensure that the interests of all electric consumers of the West are considered. We are concerned with respect to voting rights. The proposal as currently articulated is too

vague as to what issues and circumstances might lead to States Committee's votes. We would like additional detail before taking a position. However, we have initial concerns that public power liaisons might also be market participants with specific market interests rather than a focus on the public interest when contributing to any votes taken by the States Committee.

d. How else might public power/PMA perspectives be incorporated?

No specific suggestions at this time.

e. Do you agree with the proposed relationship between the States Committee and the RO board? Do you have additional considerations or adjustments to the proposal?

No comment at this time.

5. Consumer Advocates

Please see the Western Consumer Advocates' joint comments for our response to this question.

6. Do you think the elements outlined in the presentation materials of the role of an Independent Market Monitor would be effective in helping to protect the public interest? If not, please explain your rationale and include any suggestions you can offer that would strengthen the role of an Independent Market Monitor.

The Utah OCS believes that an Independent Market Monitor is a critical element of protecting the public interest. However, we request additional information and analysis on available models for an IMM rather than just advancing the current CAISO paradigm without demonstrating it best protects the public interest. For example, the workgroup should evaluate internal compared to external market monitors and, to the extent possible, evaluate what structures and design best maintain the independence of a market monitor.

7. Do you have any additional feedback you would like to share with the Launch Committee on these topics?

No additional feedback at this time.