



Portland General Electric
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Portland General Electric Comments re: West-Wide Governance Pathway Initiative - Initial Evaluation Framework for Pathways Options

Portland General Electric Company ("PGE") appreciates both the opportunity to comment on Phase 1 of the "West-Wide Governance Pathway Initiative" and the continued work of the West-Wide Governance Pathway Initiative ("WWGPI") to address the challenge of governance and remove the barriers for the California Independent System Operator ("CAISO") to expand its Regional Transmission Operator ("RTO") services outside of California.

PGE provides comments to the Launch Committee on the requested questions:

1. Do the proposed evaluation criteria support a constructive and thorough assessment of the options?

PGE supports the evaluation criteria as proposed.

2. Are the bookends reasonably defined to set the boundaries for a timely, productive exploration of available structural alternatives to governing autonomy?

PGE agrees with the Launch Committee's proposed bookends, recognizing that the specific details of any governance proposal will require significantly more detail to enable implementation.

While PGE has not made any decision on its day ahead market participation, PGE notes that the company continues to support the "joint authority" recommendation from the Governance Review Committee's as sufficient and appropriate for the CAISO's Extended Day-Ahead Market. However, PGE recognizes that not all entities share this perspective, and that the work of the Pathways initiative necessary to move towards a more independent structure that will enable participation by the broadest possible footprint. To enable this broad participation, PGE supports the consideration of an incremental step toward full independence such as the "option zero" or an "option 0.5".

PGE also encourages the Launch Committee to continue to make progress on the long-term solution of fully independent governance. While there is significant value in providing a pathway towards board participation in the EDAM, PGE recognizes that the kind of true independence envisioned by options 2-4 is a necessary precondition for a non-California utility to participate in a regional transmission organization that includes the CAISO Balancing Authority. While PGE supports an interim option, PGE encourages the Launch Committee to continue work on a fully independent governance structure in parallel. To the extent possible, PGE encourages the



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recommendations made on an interim solution to be consistent with the ultimate destination for CAISO governance.

3. Do additional options not encompassed above, but within the bookends, warrant exploration?

N/A

4. Should other aspects of the new structure not identified in the comparison matrix in Appendix B of the Scoping Paper be addressed within each option?

While PGE encourages the Launch Committee to primarily focus on the components of governance identified in the comparison matrix, PGE also recommends that the Launch Committee consider stakeholder engagement in the market design process as part of its ultimate recommendations package. PGE believes that recommendations on changes to stakeholder engagement in market design can be part of any recommendation and can significantly impact the perception of a market's governance as fair and open.

5. Are there additional threshold or high priority legal questions that should be addressed?

PGE supports the legal questions as proposed.

6. Are there additional operational questions that should be addressed or prioritized?

PGE does not have additional questions.