



October 25, 2024

West-Wide Governance Pathways Initiative Launch Committee
Comments@WestWidePathwaysInitiative.org

The International Brotherhood of Electrical Workers Ninth District (which includes Washington, Oregon, California, Nevada, Alaska and Hawaii), the Eighth District (which includes Colorado, Idaho, Montana, Utah and Wyoming), the Seventh District (which includes Arizona, New Mexico, Kansas, Oklahoma and Texas) and the local unions signing below offer these comments on the Launch Committee's September 26 Step 2 Draft Proposal.

The Stakeholder Comment Template question 1 asks:

Support for Step 2 Draft Proposal: Please indicate your level of support for the Step 2 Draft Proposal. Please provide general reactions, an indication of the benefits of the structural elements that are being proposed, and if you think that the Draft Proposal is on the right track.

We are pleased to support the Draft Proposal. The Proposal is not only on the right track, but also impressively thoughtful, thorough and balanced. It entirely meets the goals of the regulators who began the Pathways Initiative and, if implemented, would lower costs for ratepayers, increase reliability and continue progress on reducing greenhouse gas emissions.

Because the IBEW spans all the states in the Western Interconnection, we are keenly aware that each state has its own concept of the public interest. The Draft Proposal offers an impressive suite of tools that respects the rights of each state to protect its concept of the public interest while still enjoying the benefits of regional cooperation. These tools include:

- The Regional Organization corporate documents including the corporate obligation to respect state authority to set procurement, environmental, reliability, and other public interest policies;
- The RO Board being required to maintain transparent decision making processes;
- Creating and maintaining a Public Policy Committee of Board members to engage with states, local power authorities, and federal power marketing administrations about potential impacts to state, local, or federal policies before the board adopts a tariff change or an initiative through the stakeholder process;
- Extend the existing Body of State Regulators' functions to the RO;
- Creating a new independent Consumer Advocate Organization;
- Creating a new Office of Public Participation; and
- Maintaining and enhancing monitoring of the market

We also are pleased to support the market design elements that result in preserving existing economic, job and environmental benefits. These include two elements:

First, by preserving the CAISO balancing authority and other existing balancing authorities, the California RPS Portfolio Content Categories will continue to function in a manner that requires most new renewable generation to deliver directly to load and the transmission needed to deliver that energy to be built. This helps ensure that California consumers get the air quality, climate and economic benefits they are paying for.

Second, by having CAISO continue to operate the energy markets, the CAISO employees performing these functions who are represented by IBEW will keep their jobs.

Thank you for the opportunity to comment on the Draft Proposal.

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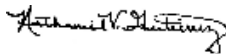


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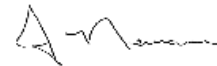


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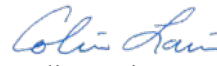
IBEW 9th District



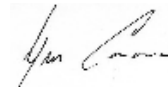
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