

California ISO EIM Governance Review Issue Paper & Straw Proposal

Comments of Public Interest Organizations:

**Western Resource Advocates, Western Grid Group, Natural Resources Defense Council,
Renewable Northwest, and NW Energy Coalition**

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Introduction

The California ISO (“CAISO”) has requested comments on its [EIM Governance Review Issue Paper & Straw Proposal](#) (“Issue Paper”). This review was mandated by the [Charter for Energy Imbalance Market Governance](#) (“EIM Charter”) to occur on or before September 2020 “in light of accumulated experienced and changed circumstances.”¹ The Issue Paper requests stakeholder input in two areas. First, the Issue Paper seeks comment on a near-term proposed change to address issues stemming from the decisional classification process. Second, the Issue Paper seeks comment on longer-term substantive changes to the EIM governance model in the following three categories: (1) the delegation of authority to the EIM Governing Body and the decisional classification process; (2) the process and criteria for selecting EIM Governing Body members; and (3) the stakeholder engagement process. Western Resources Advocates (“WRA”), Western Grid Group (“WGG”), Natural Resources Defense Council (“NRDC”), Renewable Northwest, and NW Energy Coalition (collectively, Public Interest Organizations or “PIOs”) jointly submit the following comments.

In summary, PIOs recommend the following:

- Approve CAISO staff’s proposed revision to the Guidance Document to incrementally expand the EIM Governing Body’s primary authority over policy changes to the larger real-time market that are motivated by the existence of the EIM.
- Implement another near-term governance change to resolve an inconsistency with voting procedures of the EIM Nominating Committee, providing the Public Interest/Consumer Advocate Groups sector with a formal voting role.
- Form a Governance Review Committee, modeled after the EIM Transitional Committee, to most effectively facilitate the next phase of the governance review.
- The governance review should give due consideration to the following issues, but not be limited to the consideration of only these issues:

¹ EIM Charter, p. 6.

- Modifications to the decisional classification methodology to more sustainably and clearly define the authorities that are shared between the CAISO Board of Governors and the EIM Governing Body and the authorities that fall to each body exclusively;
- Modifications to the processes of nominating and selecting EIM Governing Body members; and
- Options for formalizing the role of the Regional Issues Forum.

Comments and Recommendations

I. Near-Term: Comments on the Proposed Revision to the Current Decisional Classification Rule and Recommendation for Resolving an Inconsistency with Voting on the EIM Nominating Committee

- A. PIOs support the CAISO staff’s recommended change to the decisional classification process to consider the motivation behind real-time market tariff changes, expanding the EIM Governing Body’s primary authority to include consideration of real-time market rule changes that are driven by the existence of the EIM.

CAISO staff proposes to amend the decisional classification rules in order to clarify the “but for” language contained in the [Guidance for Handling Policy Initiatives within the Decisional Authority or Advisory Role of the EIM Governing Body](#) (“Guidance Document”).² Specifically, CAISO seeks to clarify that initiatives proposing changes to generally applicable rules of the real-time market would fall within the primary authority of the EIM Governing Body *if* the primary driver for those changes is the EIM. If implemented, this change will incrementally expand the EIM Governing Body’s primary authority.

According to the current version of the Guidance Document, the EIM Governing Body has primary authority “for considering and approving policy changes to market rules that would not exist *but for* the EIM, in contrast to generally applicable rules of the real-time market” (emphasis added). This statement implies that where a proposed policy change will impact the entire real-time market, but is not driven by the existence of the EIM, it will fall under the primary authority of the CAISO Board of Governors. Similarly, where a proposed policy change is driven by the existence of the EIM, it will fall under the primary authority of the EIM Governing Body. In practice, however, the “but for” test – which is essentially a “motivation” test – has applied to *hybrid* decisions, but has not been consistently applied to *non-hybrid* decisions.³ This is because current versions of the EIM Charter and Guidance Document clarify that the scope of the EIM Governing Body’s primary authority is delegated from the Board of

² Guidance Document, p. 2.

³ Guidance Document, pp. 3-4.

Governors and is dependent on the *type* of market rule that the CAISO is proposing to change, as opposed to the *motivation* behind the rule change.⁴

For example, there have been prior instances where the driver of an initiative was the EIM (i.e., the initiative would not have been proposed “but for” the EIM), but since the initiative applied to the entire real-time market, it was classified under the primary authority of the Board of Governors. In these cases, the EIM Governing Body would have had advisory authority only. However, advisory authority carries no real power in that it merely provides the EIM Governing Body with an opportunity to submit advice to the Board of Governors regarding a proposed tariff change – advice that the Board of Governors is not required to follow.⁵

Based on experience thus far, there are few, if any, initiatives that might apply differently to non-California EIM entities as opposed to uniformly across the entire real-time market. As a result, were this interpretation of the Guidance Document to continue long-term, it creates the very real risk of giving nearly all primary authority over the EIM to the Board of Governors, relegating the EIM Governing Body to an advisory role with no real authority. PIOs believe that such a result would be inconsistent with the original intent of the EIM Transitional Committee to appropriately empower the Governing Body, as set forth in its final proposal – [Long-Term Governance of the Energy Imbalance Market](#) (“Transitional Committee Final Proposal”) – and highlighted below:

The most fundamental principle [...] is that the EIM governing body’s duty is to promote, protect, and expand the success of the EIM as a whole and consider the interests of all participants in the ISO’s real-time market, not just those in the EIM balancing authority areas.⁶

[C]hanges to rules that apply uniquely to EIM can be expected to impact the ISO’s entire real-time market, which suggests that both the EIM governing body and ISO Board must have some role in establishing or revising such market rules, even though the Board’s involvement should be limited in most cases.⁷

This overall process where decision-making is primarily in the hands of the EIM governing body, though subject to the consent of the ISO Board, is meant to ensure that the EIM governing body has a clear and meaningful role in developing and establishing any new or revised rules that specifically affect EIM.⁸

⁴ EIM Charter, p. 3 and Guidance Document, p. 2.

⁵ Guidance Document, p. 4.

⁶ Transitional Committee Final Proposal, p. 4.

⁷ *Id.*, p. 10.

⁸ *Id.*, p. 11.

Through its proposed change, CAISO staff seeks to clarify that future initiatives seeking to change generally applicable rules of the real-time market will fall within the primary authority of the EIM Governing Body *if* the primary driver for those changes is the EIM. PIOs support this incremental expansion of the EIM Governing Body’s primary authority. This change will underscore the importance of considering the motivating factor behind future proposed policy changes and will ensure that the motivating factor is appropriately considered in the initial decisional classification process for all stakeholder initiatives. This change will not only prevent the EIM Governing Body from being relegated to a mere advisory board, but also will acknowledge the rapid growth and increasing significance of the EIM (and therefore, the increasingly important role of the EIM Governing Body), by incrementally expanding the primary authority of the EIM Governing Body. To appropriately effectuate this change, PIOs endorse CAISO staff’s proposed language modifications to both the EIM Charter and the Guidance Document.

- B. PIOs recommend another near-term governance change to resolve an inconsistency regarding the voting rules of the EIM Nominating Committee, providing the Public Interest/Consumer Advocate Groups sector with a formal voting role.

Per the [Selection Policy for the EIM Governing Body](#) (“Selection Policy”), the EIM Nominating Committee is charged with nominating candidates to fill open seats on the EIM Governing Body. It is comprised of eight members, consisting of one representative from each of the following sectors: (1) EIM Entities; (2) Participating Transmission Owners; (3) Publicly-Owned Utilities; (4) Suppliers and Marketers of Generation and Energy Services Providers; (5) the Body of State Regulators; (6) EIM Governing Body; (7) CAISO Board of Governors; and (8) Public Interest/Consumer Advocate Groups.⁹ The Selection Policy makes a distinction between voting and non-voting members on the Nominating Committee. Only three sectors are *not* afforded voting rights: (1) EIM Governing Body; (2) CAISO Board of Governors; and (3) Public Interest/Consumer Advocate Groups.¹⁰ No justification or rationale is provided for why some sectors are afforded voting rights and why other sectors are not.

In practice, it is worth noting that the Nominating Committee operates on a consensus basis, with little emphasis (if any) being placed on this voting versus non-voting distinction. In other words, all sectors have a say in candidate selection and final candidate decisions are made upon the agreement (i.e., voting) of *all* sector representatives. Only two sectors have found themselves conflicted and have thus abstained from voting in certain situations. In these situations, the decision to abstain was based on the simple fact that the sector representative would eventually be involved to some degree in approving the final candidate slate. These

⁹ Selection Policy, pp. 2-3.

¹⁰ *Id.* at 5.

situations have been limited to sector representatives from the EIM Governing Body and CAISO Board of Governors sectors only.

Thus, while it may make sense to create a voting versus non-voting distinction for those sectors that are likely to be conflicted (or face an appearance of conflict) – as has often been the case with the CAISO Board of Governors and EIM Governing Body sectors – the same reasoning does not hold true for the Public Interest/Consumer Advocate Groups sector. This sector does not face the same kind of conflict of interest concerns as it has no role in approving the final candidate slate and thus, is more similarly situated to the other sectors with voting rights. To remedy this inconsistency, PIOs recommend that the Public Interest/Consumer Advocate Groups sector be afforded voting rights on the EIM Nominating Committee.

II. Longer-Term: Other Potential Governance Changes

CAISO also seeks comment on potential substantive areas for review as part of the broader effort to re-evaluate EIM governance as mandated by the EIM Charter. PIOs offer the following additional comments.

- A. Rapidly changing circumstances unique to the EIM highlight the need to consider the formation of a Governance Review Committee to address necessary governance changes for ensuring the long-term success of the EIM.

The comments that follow are a mere sampling of issues and recommendations that have the potential to substantially change the current model of governance for the EIM. The original Transitional Committee foresaw that this would be the case and therefore recommended this governance review, a process that is now required by the Governing Body’s charter.¹¹ These changes are significant and are characterized by the EIM’s rapid growth, the EIM Governing Body’s cumulative experience with the market’s operations, and the near-term possibility of adding day-ahead market services to the EIM via the EDAM initiative. The scope of potential governance modifications necessary to appropriately address these changes is potentially far-reaching and therefore seems ill-suited for a traditional CAISO stakeholder process where issues are typically addressed in the context of very specific tariff changes. Rather, a reformulation of the EIM Transitional Committee, which PIOs are referring to as a “Governance Review Committee,” seems the more effective path forward for addressing this next critical phase of EIM governance.

The Governance Review Committee would benefit from the open and transparent process established by its predecessor, the Transitional Committee. This process would include regularly scheduled public meetings to solicit stakeholder input on EIM governance, as well as

¹¹ Transitional Committee Final Proposal, pp. 19-20 and EIM Charter, p. 6.

opportunities for stakeholder comments on various iterations of what should eventually become a final proposal for EIM governance. Members would represent a diverse set of sectors and qualifications and would be selected through a similar nomination and appointment process. However, in this instance, final appointments would ultimately be determined by the EIM Governing Body rather than the CAISO Board of Governors. Once formed, the Governance Review Committee would operate under CAISO's Open Meeting Policy and would operate independently of the both the CAISO Board of Governors and the EIM Governing Body. Similar to the original Transitional Committee, the Governance Review Committee should be provided adequate time following its establishment to develop a final governance proposal for the EIM.

The Governance Review Committee should be empowered to address any and all issues pertaining to the long-term governance of the EIM, including the consideration of changes that may be necessary if day-ahead market services are eventually added to the EIM. PIOs wish to highlight the following issues, which we recommend be considered as part of this comprehensive review.

- B. Consider modifications to the decisional classification process that more clearly and sustainably establish the authorities that are exclusive to each board and the authorities that are shared by both boards.

The present decisional classification guidelines attempt to create a binary construct in which any policy change is classified as wholly within the authority of one board or the other. Even the hybrid classification is binary in the sense that a hybrid decision is one which is composed of multiple inseparable policy changes – some falling under the exclusive jurisdiction of one board and the remainder under the exclusive jurisdiction of the other.¹²

This binary construct would otherwise be easy to implement and understand if the respective missions of each board provided for a clear, bright line of division. Unfortunately, this is not the case today. The California statute establishing CAISO – [AB 1890](#) – makes clear that the intent of the CAISO is to operate a California transmission system reliably and to operate an efficient power exchange as a California public benefit corporation. Implied is the fact that the five-member Board of Governors – appointed by California's governor and confirmed by the state's senate – is charged with protecting the interests of California ratepayers in all activities in which the CAISO engages.

By contrast, the EIM Governing Body's mission is to “promote, protect and expand the success of the EIM [.]”¹³ However, the EIM Governing Body's mission necessarily overlaps with the mission of the CAISO Board of Governors by the simple reality that the EIM – a multi-

¹² EIM Charter, pp. 3-4 and Guidance Document, pp. 2-5.

¹³ EIM Charter, p. 3.

state market – is an extension of CAISO’s single-state real-time market. This is acknowledged in the EIM Charter:

The EIM Governing Body shall promote, protect and expand the success of the EIM for the benefit of its participants as a whole, with due consideration of the interests of all participants in the ISO’s real-time market, including both participants transacting in the ISO’s balancing authority area and participants transacting in EIM balancing authority areas (meaning the balancing authority areas of EIM entities, collectively).¹⁴

If there were a clear, bright line dividing the mission of each board, it would imply that the EIM Governing Body’s mission would be to protect the interests of the non-California entities in all activities (necessarily interstate) in which the CAISO engages. However, the real-time market, of which the EIM is a critical part, is a unified interstate market which cannot be operated under one set of policies applying to California entities and another set of policies applying to non-California entities.

Given experience to date, CAISO’s proposal to clarify the “but for” test and expand the EIM Governing Body’s primary authority is a necessary refinement that provides clarity on how policy changes are to be approved now. However, as more time elapses and more members join the EIM, the EIM and the real-time market are likely to become increasingly indistinguishable. Longer term, it seems that fewer and fewer policy changes will be made solely because of the existence of the EIM, but rather more often as general enhancements of, and fixes to, the real-time market, making a “but for” determination subjective, vague and open to challenge. PIOs therefore do not view clarification of the “but for” test as a permanent fix to the division of governance between the EIM Governing Body and the CAISO Board of Governors.

Rather, for simplicity’s sake, it may make sense to develop a clear line of division between the authority of the EIM Governing Body and the CAISO Board of Governors, including the consideration of those initiatives that would remain categorized as having “shared” board authority. There are potentially many ways to accomplish this and PIOs recommend that the governance review entertain all feasible options. Below, PIOs outline two potential options for accomplishing this division of authority, but are not making a recommendation in support of either such option at this time.

Option 1: Delineate governance between interstate markets and services versus California-only markets and services.

¹⁴ *Id.*

This option would cleave governance between those markets and services that are interstate versus those that are unique to California. This construct would thereby delegate to the EIM Governing Body authority over policy changes for both the EIM and real-time market. By contrast, the Board of Governors would have authority over transmission and integrated forward market policy changes at least until or if such time as the EDAM is launched and has a non-California participant.

While this option creates a bright line division in authority between the two governing boards, PIOs foresee that this construct could still create ambiguity. For example, if the EDAM is launched but is *voluntary* for non-California participants (i.e., decisions regarding the amount of transmission capacity allocated to the EDAM and which power plants will participate are ultimately made by the EIM entities), while for California entities it is effectively *mandatory* and under the control of the CAISO, how would policy changes to the EDAM be handled when they would have different impacts on California versus non-California entities? Should one board take precedence over the other? Is that fair to all participants? There is also the issue of the CAISO's annual work plan and associated budget, which are currently approved exclusively by the Board of Governors, but have impacts on interstate markets and services. These issues would need to be carefully considered and addressed under this option.

Option 2: Create a “dual board” governance model whereby the CAISO Board of Governors and the EIM Governing Body have shared roles in governing the various markets.

The second option eliminates the binary concept requiring one board or the other to have final authority over all policy changes and instead adopts the principle that many policy changes affect both California and non-California entities and must therefore be affirmatively approved by both boards. Affirmative approval would necessarily require a majority vote of approval by both boards and where approval cannot be obtained, would require CAISO management to develop a revised proposal for both boards' reconsideration.

Examples are instructive for better understanding how the dual board model would work in practice. Under this model, both boards' approval would be required for most policy changes to the EIM since these changes would not only impact the EIM, but also the CAISO's real-time market. Similar to the EIM example, if and when EDAM is launched (given its interstate implications), it is likely that most policy changes for it would require both boards' approval. Transmission policy changes (at least until EDAM is implemented) would fall exclusively to the Board of Governors. In the rare instances where only California or non-California entities would be impacted, the appropriate board would exercise its single-board authority. Examples where single-board authority would apply include policy changes related to transmission and the current integrated forward market. It is worth noting that under the dual board model, either board could provide advice to the other board at any time on any issue.

As a point of clarification, the dual board governance model is not the same as the present “hybrid” decisional classification. The hybrid distinction only applies to non-severable issues – that is, where a policy change requires multiple tariff changes, some of which are under the authority of the EIM Governing Body and some of which are under the authority of the Board of Governors, and where the changes are so interdependent as to be deemed non-severable from the initiative as a whole. In effect, under the dual board model, primary and advisory distinctions would disappear, being replaced by a distinction of single-board authority versus dual-board authority, which would subsume the current hybrid classification (which is rarely used in any event). Additionally, the dual board governance model embraces the concept that many policy changes cannot be separated on the basis of geography, and therefore would require both boards’ approval.

Similar to Option 1, this construct would still have ambiguities around issues like the annual budget and work plan and the potential implementation of EDAM. As with Option 1, these issues would require careful consideration.

- C. Consider eliminating the requirement that the CAISO Board of Governors provide final approval of decisions that are squarely within the authority of the EIM Governing Body.

In concert with our prior recommendation that the governance review consider further modifications to the delineation of authority between the Board of Governors and the EIM Governing Body, PIOs also believe that consideration should be given to eliminating the requirement for the Board of Governors to approve any decision that is solely within the purview of the EIM Governing Body, even on a consent agenda basis.

The current construct in which the Board of Governors must approve the decisions of the Governing Body creates the perception that the EIM Governing Body is subservient to the Board of Governors. This is because when the EIM Governing Body approves a tariff change within its primary authority, that decision is placed on the Board of Governors’ consent agenda. While items placed on the Board of Governors’ consent agenda *technically* require no further action and can thus be automatically approved, by a simple majority vote, the Board of Governors has the power to remove items from the consent agenda and consider the merits of a particular proposal.¹⁵ The Board of Governors could then ultimately decide to reject the matter, requiring CAISO management to develop an entirely new proposal for reconsideration by both the EIM Governing Body and the Board of Governors.¹⁶

In other words, under the current EIM governance framework, the Board of Governors has the authority to veto or “undo” any of the EIM Governing Body’s decisions. By contrast, the

¹⁵ Guidance Document, pp. 2-3.

¹⁶ *Id.*, p. 3.

competing governance frameworks recommended in the previous section (and especially the dual governance construct), strive to put both boards on an equal footing. PIOs therefore recommend that, in conjunction with consideration of any option to modify the decisional classification process, that consideration also be given to clarifying that the approval of either board over its respective area of authority constitutes “board approval” for purposes of filing at FERC. PIOs acknowledge that challenges may exist to implementing such a change, including but not limited to those instances where a substantive legal or jurisdictional conflict arises, requiring formal endorsement by the Board of Governors.

D. Election of EIM Governing Body members by fellow EIM Governing Body members may create a conflicted process.

The selection process of the EIM Governing Body is fairly unique among organized electricity markets in the United States, in the fact that each sitting member who seeks re-election (and is re-nominated by the Nominating Committee) is then elected to the Governing Body by his or her four sitting colleagues. Aside from the CAISO, which appoints members to its Board of Governors through a highly political process that is unique in the United States, only the ISO-NE and NYISO elect board members by a vote of existing board members. The other organized markets (PJM, MISO, SPP and ERCOT) elect their directors through a vote of the members of the organization.

In the case where an existing director seeks re-election and is re-nominated, the subsequent election by the other directors can create the appearance of a conflicted process. Except perhaps in extraordinary cases, it would be unusual for a majority of the voting members to vote against the director seeking re-election. Particularly with a small board like the EIM Governing Body, it would be expected that the five members would develop a close camaraderie over the duration of their terms, which could theoretically create pressure on the voting members to vote for their re-nominated colleague even if they thought another candidate better suited to the job. This, in turn, leads to the phenomenon of the “circular board”, whereby board membership remains static for years until a member terms out or decides voluntarily to not seek re-nomination. This is the main reason that most market operators in the United States have taken the burden of electing directors off the board and placed it instead with some form of a stakeholder advisory committee, such as a members committee.

Possible ways of addressing this concern include formalizing the role of the Regional Issues Forum (“RIF”) and creating a more formal Stakeholder Advisory Committee (“SAC”), relying on the same stakeholder sectors as the RIF, but providing this committee with the added responsibilities of advising the EIM Governing Body and electing members to the EIM Governing Body. Such a committee would still rely on the valuable work currently performed by the EIM Nominating Committee, including candidate vetting and final candidate

recommendations. Another option is to require, as part of the Selection Policy for the EIM Governing Body, the requirement that when a current member's term expires and that member seeks re-nomination, that the executive search firm then under contract with the CAISO must immediately initiate a candidate search process to present potential competing candidates for consideration by the Nominating Committee. In this way, the Governing Body member seeking re-nomination will never be considered and evaluated in a silo, but rather, will need to compete with the credentials of additional candidates vying for the same position, ensuring consistency and fairness in the board nomination and approval process. It is worth noting that this particular recommendation could be implemented with or without the formation of a SAC.

- E. Consider the creation of a more robust and meaningful stakeholder engagement process – first, by empowering the Regional Issues Forum with more authority and later, by transitioning the RIF into a more formal Stakeholder Advisory Committee.

PIOs believe that longer term, a more formal stakeholder process should be considered for the EIM, as it has the potential to provide additional value through increased stakeholder engagement. Ultimately, care should be taken to ensure that any stakeholder process is manageable in both size and operation and further, that it does not unnecessarily impair the decision-making ability of the EIM Governing Body. If done right, a more formal stakeholder process can help ensure that stakeholder voices are taken into account when making important decisions impacting the success of the EIM and eventually, the EDAM.

There are a number of ways to provide more formality around the existing stakeholder process and PIOs recommend the consideration of an incremental approach. Such an approach would begin by formalizing the existing role of the RIF and later, would consider transitioning the RIF into a Stakeholder Advisory Committee, or SAC.

As an initial step, the RIF should be empowered to advise the EIM Governing Body on issues currently under consideration by the Governing Body, including through written comments that could indicate both majority and minority opinions. Presently, the RIF is not empowered to provide such formal recommendations. Rather, the RIF is limited to addressing broader issues of EIM operations and, “should not take up for consideration individual policy issues that are currently part of an ongoing stakeholder process[.]”¹⁷ It is important to clarify that under this proposal, the RIF's input would be considered advisory to the EIM Governing Body and would not supplant the existing CAISO stakeholder process. The value added through enabling the RIF to provide formal recommendations is through the additional input provided to the EIM Governing Body as it considers market rule changes to ensure the success of the EIM and larger real-time market.

¹⁷ Transitional Committee Final Proposal, pp. 18-19.

Another option for formalizing the stakeholder process includes considering the eventual transition of the more casually organized RIF into a more formally organized Stakeholder Advisory Committee. The composition of the SAC would differ from more traditional member or market advisory committees found in other organized markets in that the SAC's membership would not be narrowly tailored to only utility and commercial interests, but rather, would take into account broad and diverse stakeholder representation, modeled after the EIM's Nominating Committee, Transitional Committee, and Regional Issues Forum. It is important to note that this committee, as envisioned by PIOs, would not have decisional authority, and could therefore not veto or modify CAISO staff recommendations, but would instead be a formal advisory channel to provide opinion and counsel to the EIM Governing Body itself. In this way, the role of the SAC is very similar to the more formalized RIF envisioned by the preceding paragraph. However, as previously noted, by transitioning the RIF into a more formalized stakeholder committee structure with voting sectors, the SAC could be empowered with the additional authority of approving appointments to the EIM Governing Body after receiving final recommendations from the EIM Nominating Committee.

PIOs acknowledge that the existing CAISO stakeholder process works well and we do not seek to supplant it with either of these recommended considerations. Rather, through the governance review process, we simply request that the Governance Review Committee consider ways in which to effectively facilitate more comprehensive stakeholder input to the EIM Governing Body, using the existing RIF model as a starting point.

Conclusion

PIOs appreciate the opportunity to provide these comments and recommendations related to CAISO's EIM Governance Issue Paper & Straw Proposal. Additionally, we look forward to continued engagement in the longer-term review of EIM governance, as mandated by the EIM Governing Body Charter.

Respectfully submitted,



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