



Markets+ Working Group and Task Force Charter Comment Summary

April 7, 2023

SPP received comments on the Markets+ working group and task force charters from:

[Arizona Electric Power Cooperative](#)

[Arizona Public Service](#)

[Bonneville Power Administration](#)

[Interim chair of the Markets+ State Committee Chairman Blank](#)

[Puget Sound Energy](#)

[Snohomish County Public Utility District](#)

[Western Resource Advocates](#)

AEPCO Comments on SPP Markets+ Phase 1 Working Group and Task Force Charters

Introduction

Arizona Electric Power Cooperative (AEPCO) appreciates the opportunity to provide comments on the SPP Markets+ Phase 1 Working Groups (WG) and Task Forces (TF). We commend SPP for its efforts up to this point. As funding member of Phase 1, we look forward to participating in the Markets+ design process.

General Comments

AEPCO generally supports the WGs and TFs that SPP has proposed. As other entities have asserted, the Phase 1 design effort should include clear timelines and expectations, a coordinated schedule, and a living document of all issues raised for transparency. Ideally, SPP should provide as much context and background on each design topic as possible as a baseline for the WGs and TFs. Given the lack of experience most entities have with SPP's Eastern RTO, it will be important to understand the "boiler plate" language that SPP intends to start with. Finally, any opportunity to streamline and/or condense the number of WG/TF could allow for more efficient meetings and advancement with the expedited schedule.

AEPCO supports having all meetings recorded and understands that SPP will make meeting recordings available upon request; however, the given the potential for administrative burden, AEPCO, like others, supports having recordings posted publicly.

WG/TF Structure

SPP proposes to limit the number of voting participants of each WG and TF, and to maintain an equal balance of investor-owned utilities (IOU), public power entities, and independent entities. While this proposal mirrors the governance structure in SPP's Eastern RTO, AEPCO believes that all Phase 1 funding members should have voting rights for all WG and TF matters. It may be appropriate to pare back the number of voting members once the market is active, but during the development stages of Markets+, each funding party should have an opportunity to vote.

AEPCO requests clarification on the proposed sector voting limits. If one sector has fewer participants, does this reduce the number of participants for the other sectors? For example, if the Markets+ Design Working Group were limited to 24 voting participants, and the "independent" sector only had six entities that wish to vote, would the voting seats for IOU and public power sectors reduce to six votes as well? Alternatively, does SPP consider weighted votes or some other method?

Individual WG/TF Comments

AEPCO provides the following comments on the Seams Working Group and the Resource Adequacy Task Force charters.

Seams Working Group: Effective seams management is vital to maintaining reliable operations with neighboring utilities in the West. As such, AEPCO understands the importance of addressing seams during the market development process. AEPCO generally supports the Seams Working Group charter; however, given the ongoing discussion of Resource Adequacy (RA) in the West, AEPCO recommends that the RA Task Force should be separate from the Seams Working Group.

Resource Adequacy (RA) Task Force: AEPCO has concerns that the RA Task Force's charter is too specific with regard to the Western Resource Adequacy Program (WRAP) requirement. Participants should have the opportunity to debate whether the WRAP requirement is appropriate or whether there should be an alternative option for participants that are uniquely situated. Additionally, if SPP maintains a limit on the number of voting members for each WG/TF, the RA Task Force should either expand to 18 voting members or be a standalone Working Group.

From: Brian.Cole@aps.com
To: [SPP Markets+](#)
Cc: [Carrie Simpson](#)
Subject: ****External Email**** Comments from APS on Charters/Scope of Workgroups/Task Forces
Date: Wednesday, April 5, 2023 10:38:36 AM
Attachments: [image001.png](#)

CAUTION: This email originated from outside of the SPP network. Do not click links or open attachments unless you recognize or can verify the sender, or were expecting an email from the sender. The original sender of this email is Brian.Cole@aps.com

SPP/Carrie,

APS has some thoughts on the draft charters/scopes for the work groups and Task Forces as described below. Thanks for your consideration.

General:

- Addition of reference or pre-requisite section would be beneficial. The list of Phase 1 participants has entities that likely weren't in the discussions from last year and would be playing catch-up. Any history of past discussions or general direction to communicate would assist in avoiding the re-hashing of past discussions although a verbal, high level summary of where we have been should still be part of the process.
- What happens if 1/3 IOU, 1/3 public power, 1/3 Independent representation is not achievable due to uneven level of interest from sectors? Would interested sectors be limited by the non-interest of other sectors in participation levels or would non-interested be forced to participate?

Market Design Working Group

- Is this the group that owns the tariff draft and submission to MPEC? Scope item #2 mentions changes to a not yet created tariff but is this the work group that has final ownership of the tariff ahead of it going to MPEC?
- Reference Materials - Integrated Marketplace Protocol, Service Offering, market training from SPP, ??
- No mention of which group is responsible for determining transaction fees to cover on-going SPP operational costs. It might be this group or could be handled somewhere else.

Congestion Rent Task Force

- Reference Material - Service Offering
- The scoping document is clear that this group will work on methodologies for rent allocation but is not clear on responsibility for developing the methodology for calculating the actual congestion costs. Does that responsibility rest with the Market Design Team or this one?

Seams Working Group

- Scope is written as if some level of seams agreements are in place. Should reflect that this is not the case and the seams working group would be looking at market operations, reliability operations, transmission planning, and WRAP inter-operability seams and creating the processes, procedures, tariffs, or business practices proposals.

- Reference Material - WRAP detailed design document, SPP existing seams agreements.
- Silent on who is responsible for engaging with other markets on Seams agreements. The language hints that agreements should already be in place and the group will make recommendations on improvements. From the language it appears that SPP will be responsible for putting Seams agreements in place with other markets. It is not clear whether Working Group members will have direct involvement in the design and negotiation of the agreements or whether SPP will just take input and negotiate on behalf of participants. We should discuss whether Seams Working Group members should be at the table for any negotiations with others
- Lastly, the SEAMs working group should be clearly directed to produce a viable and fair seams construct that could be used as a proposal as the SPP Markets+ proposal to CAISO/others. This proposal should be at a level that, if either not agreed-to by CAISO or CAISO was unwilling to negotiate, it could be filed with FERC as part of the Tariff filing

Resource Adequacy Task Force

- The scope and purpose is written in a manner where the task force doesn't propose changes to the WRAP program. It should clearly state that the WRAP Operations program may need to adapt to a market overlay. In other words, trying to find the best way to keep the WRAP intent and benefit while adapting both the market design and the WRAP design to work together to gain the best overall outcome. For example the task force should review with WPP the requirement of a must offer requirement in replacement of an operations program since all Markets + participants are required to be WRAP participants.
- Reference Material - WRAP Detailed Design, SPP RTO RA and Must Offer Requirements

Brian



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Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

April 6, 2023

In reply refer to: BTO, Market Initiatives

To: Southwest Power Pool - Markets +

Re: Comments on Draft Working Group and Task Force charters

Bonneville appreciates that SPP has made the draft charters available for stakeholder review. Bonneville believes that in their current state the charters appear more like an assignments list for the work groups and task forces and does not identify the objectives for Phase 1, suggests that the scope of these charters focus on the objectives and functions for Phase 1. The charters can be improved by considering the following:

- 1) The role and responsibility of the MPEC is to oversee the work plan for phase 1 and to evaluate progress against milestones. The MPEC charter does not appear to give the MPEC the ability to prioritize and redirect work of SPP staff – which seems especially important with the tight phase 1 timeline.
- 2) The charters do not address the roles and responsibilities of the chair and vice chair position. Bonneville suggests inserting details about the roles and expectations for the work group or task force leadership positions (i.e. chair and vice-chair).
- 3) The charters do not address the role for SPP staff. The intent is to have SPP staff participate in the working groups and task forces. We suggest the charters be amended to identify expected roles for SPP staff in each group/task force.
- 4) None of the charters identify the voting rules or procedures. Bonneville understands that the final service offering does provide insight on voting but not all future stakeholders may be aware that they need to reference back to the service offering to gain clarity on voting. In many charters it is typical to identify the voting rules and process. Bonneville requests that MPEC consider amending all the charters to include a section on voting.
- 5) Bonneville understands that voting at the work group and task force levels is based on a simple majority. Bonneville requests that the charters identify that all votes taken will be recorded by a member or SPP staff and noted in the meeting notes. Also, Bonneville suggests that the identity of those voting for and against a proposal be identified and a short position statement outlining the merits of the majority position and the concerns of the minority position be recorded in the meeting notes and that both positions be passed to the MPEC or work group in the case of task forces when seeking higher ratification or approval of an item.

- 6) In the charter for most of the working groups there is reference to the composition of voting membership being comprised of 1/3 Publics, 1/3 IOUs, and 1/3 Independents. Could you clarify how that balance will be established and maintained? If there is an unbalanced number of participants from each category do you intend to reduce the voting number until the balance is achieved? Given the manageable number of participants in Phase 1, Bonneville suggests that MPEC consider simply utilizing one vote per funding entity that is participating in the group or task force and not seeking a balance between member types, if it means excluding interested parties from having a voting seat.
- 7) Bonneville is aware of SPP's desired intent to have open meetings across the various groups. However, Bonneville is concerned that the charters do not explicitly incorporate open meeting standards and do not directly permit participation by non-voting members, and suggests MPEC consider amending the charter to incorporate open meeting standards and clearly state that participation by non-voting members is acceptable. Bonneville suggests a provision such as the following:

Meetings of the work group/task force will be open non-voting participants and to the public. All decisional items shall be placed on the open meeting agenda. Non-voting participants and members of the public will be given the opportunity to participate in all discussions and provide comments on decisional items. Voting will be conducted in open session, and individual participant voting recorded.
- 8) Bonneville believes that the prospect of achieving the desired Phase 1 outcomes on the aggressive timeline currently anticipated would be greatly enhanced if the work group and task force charters concluded by clearly stating the expected objective and deliverables of each work group and task force, and the timeline on which that deliverable needs to be presented to the MPEC. The timelines should align with the anticipated schedule for MPEC meetings and the time needed for MPEC members to review the proposals prior to decision meetings.
- 9) Bonneville examined the MPEC voting structure and the published list of phase 1 funding entities. We have a potential concern around a disproportionate amount of voting power residing with a small number of entities making up a category. Bonneville suggests that the MPEC examine the category placement of phase 1 funding entities to ensure that no single category inadvertently receives a disproportionate amount of voting power because of a limited number of funders are placed in one particular category
- 10) In the event that a quorum is needed for a meeting, Bonneville suggests the charter be updated to include the definition of the number of members that comprise a quorum.

Southwest Power Pool, Inc.
MARKETS+ GREENHOUSE GAS TASK FORCE
Task Force Scope Statement
XX/XX/2023

PURPOSE

The Markets+ Greenhouse Gas Task Force (MGHGTF) is responsible for the development and oversight of policies and procedures incorporating emissions-related information to the reporting, price-formation, and commitment and dispatch of Markets+. The MGHGTF proposes changes to the SPP Markets+ Tariff and other governing documents needed to implement suggested market changes. The MGHGTF provides policy input to the Markets+ Design Working Group (MDWG).

SCOPE OF ACTIVITIES

In carrying out its purpose, the MGHGTF:

1. Develops and recommends the Markets+ Market Tariff and Protocols language to reflect state and federal emissions policies, as necessary, within the Markets+ footprint.
2. Participates in oversight of any ongoing Markets+ market development process involving the [economic dispatch of resources, price formation, reporting, and accounting of emissions consistent with state or federal law](#), ~~and dispatch of~~ greenhouse gas policies.
3. Coordinates with regulators, [state agencies](#), and task forces in implementation of SPP administered Markets+ wholesale market.
4. Coordinates with other SPP Markets+ organizational groups and task forces, as appropriate, in the development of market changes related to greenhouse gas policies.
5. Works with other SPP Markets+ organizational groups and tasks forces, to prioritize all Markets+ Executive Committee (MPEC) approved system and process changes.

REPRESENTATION

The MGHGTF is comprised of at least 12 and up to 20 Markets+ Market Participants and Markets+ Market Stakeholders, including a chair.

The MGHGTF shall maintain a balance of one-quarter investor-owned utilities, one-quarter public power entities, one-quarter independent entities, and one-quarter state officials appointed by the Markets+ State Committee (MSC). MGHGTF representatives shall represent the diversity of the Markets+ stakeholders. [The MGHGTF shall maintain one IOU or MSC representative from every state with a compliance-based emissions trading program or a statutory emissions cap that also has retail electric load in the Markets + footprint.](#)

DURATION

The MGHGTF will be dissolved at the completion of the Scope of Activities or approval by the MDWG.

REPORTING

The MGHGTF reports to the MDWG for all activities. As necessary, the MGHGTF may appoint a representative of the MGHGTF as a liaison to other SPP Markets+ organizational groups and task forces for specific issues or action items being coordinated.



Energizing Life in Our Communities

April 6, 2023

Comments on Markets+ Draft Scope Statements

Public Utility District No. 1 of Snohomish County (Snohomish) appreciates SPP putting forth the draft scope statements for the Markets+ Participants Executive Committee (MPEC), working groups, and task forces. Overall, Snohomish is supportive of the draft scope statements and offers several targeted suggestions for consideration.

General Comments

- We note that the Service Offering issued on November 30, 2022 contains substantial details around the formation and procedures of the MPEC, working groups, and task forces. We suggest that each scope statement reference the relevant section of the Service Offering that deals with the MPEC, task forces or working groups, respectively. This will clarify that each scope statement should be read in conjunction with those relevant sections.
- The Service Offering indicates that task forces can be established by either the MPEC or by their parent WG and that the establishing body is responsible for determining task force membership and chair selection as well as filling future vacancies, etc. We recommend making clear which body is establishing each task force within the task force scope statement.
- Throughout many of the scope statements, there are references to coordination with “other SPP Markets+ Organizational Groups and task forces”. We recommend clarifying whether “organizational groups” refers to working groups or if the term is intended to be broader.
- The Representation section of each scoping document refers to “independent entities.” We assume this term refers to all Markets+ Market Participants and Markets+ Market Stakeholders that are not classified as either public power entities or investor-owned utilities; is this understanding correct?

Markets+ Design Working Group (MDWG)

The Purpose section of the MDWG scope statement includes a list of topic areas for which the MDWG is responsible. We agree with all items on the list and recommend several more for consideration:

- Real-time congestion rent allocation (in addition to day-ahead)
- Uplift payments and cost allocation
- Internal participation models for various resource types (including hydro)
- External resource participation
- Price formation (e.g., fast start pricing and scarcity pricing)
- RUC design and processes
- Convergence bidding

Markets+ Transmission Working Group (MTWG)

- Consider rewording item #1 listed under Scope of Activities. “Markets+ Tariff and Protocol language...” may be redundant with “... Markets+ applicable governing documents.”
- Consider adding the following items to the Scope of Activities:
 - Coordination with internal and neighboring transmission service providers (TSPs) to determine congestion management needs, possibly in conjunction with the Seams Working Group.
 - Potential carve-outs for transmission service rights owned by customers of participating TSPs.
 - Procedures around communication of transmission availability between the market operator, participating TSPs, and transmission customers, possibly in conjunction with the Operations and Reliability Working Group.

Markets+ Seams Working Group (MSWG)

Consider including two additional seams/relationships within the scope:

- Markets+ and reliability coordinators
- Electric market and gas market (including coordination of the timing of market functions with the gas day)

Markets+ Congestion Rent Task Force (MCRTF)

We recommend including within the MCRTF scope real-time congestion rent allocation in addition to day-ahead.

Markets+ GHG Task Force (MGHGTF)

Consider rewording item #2 under Scope of Activities to “Participates in oversight of any ongoing Markets+ market development process involving ~~the~~ reporting, accounting, and dispatch ~~to facilitate participants’ compliance with~~ ~~of~~ greenhouse gas policies,” or similar.

* * * * *

We believe that the scope statements as revised above will help lay the groundwork for the important work that lays ahead for the MPEC, working groups, and task forces throughout Phase One of Markets+ development and beyond.

Comments from the Interim Chair of the Markets+ State Committee on the Charters and Nominations of the Markets+ Participant Executive Committee Working Groups and Task Forces

April 6, 2023

The interim chair of the Markets+ State Committee (MSC), Eric Blank, also the current Chair of the Colorado Public Utilities Commission, appreciates the opportunity to provide the following comments to the Southwest Power Pool (SPP) on the nomination and appointment of members to the Markets+ Participant Executive Committee (MPEC) Working Groups and Task Forces. These working groups and task forces are critical to the success of Markets+ as they cover key elements of the market design and operation. Currently, the MSC has voting representation on the Greenhouse Gas (GHG) Task Force only, and while this is an important task force, the MSC's purpose is to effectively engage and provide direction and input in any Markets+ policy matter deemed pertinent by the MSC and its members.

The interim chair of the MSC requests that SPP allow the MSC to be represented on all working groups and task forces for Markets+ as a voting member and allow the MSC to revise its representation once it can identify critical areas of interest to its members. At this time, the MSC is in the process of adopting its charter and formalizing its membership and leadership, as well as its document review and comment processes, and thus does not yet have the ability to formally comment, let alone appoint members to the working groups and task forces. For this reason, the MSC cannot offer comments on the charters of the proposed working groups and task forces. Likewise, the MSC today does not have the means to thoroughly assess and determine its role in the eight working groups and task forces currently proposed and recognizes that the scope of the committee's role and participation in these working groups and task forces will need to be adjusted at a future date.

Given this consideration, **the interim chair of the MSC further requests that SPP accept MSC nominations to the working groups and task forces through the end of April 2023.** The MSC anticipates the formalization and charter adoption to occur on April 12, 2023, at the MSC Meeting scheduled in conjunction with the Spring 2023 Committee on Regional Electric Power Cooperation (CREPC) Organizational Meeting in Incline Village, Nevada. Once the charter is adopted and the leadership is elected, the MSC will work to identify the key working groups and task forces it will actively engage in and will assign members accordingly by April 30, 2023.

The interim chair of the MSC thanks SPP for consideration of these requests. State perspectives on issues of governance, market design, resource adequacy, and seams between other programs are foundational for a successful day-ahead market with robust stakeholder engagement. The interim chair of the MSC hopes that SPP can honor these requests and allow the committee more time to formalize its structure, develop comments, nominate its members, and tailor its involvement in the Markets+ working groups and task forces.

Western Resource Advocates
Comments on SPP Markets+ Charters and Phase One Plan
April 6, 2023

Submitted via email to marketsplus@spp.org.

Western Resource Advocates (WRA) appreciates the opportunity to provide these abbreviated comments to the Southwest Power Pool (SPP) on the Markets+ draft charters for committees, task forces and working groups (“organizational groups”) and Phase One Development Plan.

SPP has requested comments on the staff developed, draft charters for each of the nine organizational groups and additional comments on the Phase One development plan as represented by SPP Update Presentations on March 2, March 16, March 30, 2023. Given the very short comment period (five business days), public interest organizations (PIOs) were not able to confer and develop joint comments as we normally do. WRA herein submits abbreviated comments on a limited number of issues and will engage more thoroughly at the April 18-19 Markets+ in person meeting. These comments do not represent all of the issues about which WRA may have concerns, all of the provisions to which WRA may support amendments or all of recommendations WRA may ultimately offer.

Section A of this document includes general comments regarding the draft documents and high-level comments on several of the draft charters. Section B includes some comments regarding the Phase One Development Process.

A. Draft Charters / Scoping Documents.

First, it is not clear what we are developing via the draft documents. The draft documents are sometimes referenced as “scoping documents,” sometimes referenced as “charters” and titled “Scope Statement.” Are we developing a portion of a charter or are these documents intended to be charters limited to the sections in the drafts? Charters are typically more comprehensive. For example, they include objectives, procedures, authority, reporting requirements, etc. For a good example see, the [WRAP Program Review Committee Charter](#). The Markets+ organizational groups need charters, not just scoping statements. As it is now, this information is scattered amongst several resources. Some information is in the Service Offering, some information is in presentation slide decks, see for example the [April 4, 2023 Markets+ Update deck](#), and some information is included in the draft scope statements we are reviewing now. This is confusing and contrary to the stated goal of transparency. All of the relevant information should be included in one document, the charter, so that the organizational groups (and stakeholders) clearly understand their mission, procedures and authority. This is also critical to ensure stakeholder trust in both the process and outcome.

WRA Recommendation: Each Markets+ organizational groups should have a charter that is more comprehensive than the draft scoping statements.

WRA submits the following comments on specific Markets+ Working Groups and Task Forces. These Working Groups and Task Forces represent those for which we have the highest interest level and that we consider most relevant to our public interest engagement in the design of the Market+ offering.

➤ **Markets+ Greenhouse Gas (GHG) Task Force (MGHGTF)**

WRA Observations:

The "scope statement" is confusing and should be differentiated from an actual "charter," which would include a more in-depth description of responsibilities, authority, and procedures. The "Scope of Activities" are appropriate but very broad.

WRA Recommendations:

Given the limited time and substantial work to be done to evaluate and implement a brand-new GHG dispatch and reporting model for a Western market, WRA strongly recommends including specific targets for completion in the final scope description, rather than just general oversight of GHG development. This is even more important because the scope states the "MGHGTF will be dissolved at the completion of the Scope of Activities or approval by the MDWG [Markets+ Design Working Group]." The GHG reporting section is short and vague. The document states that the "MGHGTF reports to the MDWG for all activities." This needs clarification. Further, what communication is required and what is the approval process?

➤ **Markets+ Seams Working Group (MSWG)**

WRA Observations:

The MSWG covers traditional seams issues between markets. Two important elements that need to be considered are the complex seams that may exist between Markets+ and CAISO's Extended Day-Ahead Market (EDAM). The seams between these two-day ahead markets could become the most complex in the country due to the fact that neither would be a regional transmission organization (RTO) and the boundaries between Markets+ and EDAM could create a very problematic geography. In addition, the sub-seams between utilities, if not addressed properly, could also create problems.

WRA Recommendations:

The scope of the MSWG should include these issues as well as traditional seams issues between SPP and Markets+ and CAISO and Markets+. One further issue that is not addressed in the scope is the relative lack of transmission connectivity between Markets+ utilities and between Markets+ states. The MSWG should partner with the Transmission Working Group to look at transfer capacities, transmission planning, and future transmission needs.

➤ **Markets+ Transmission Working Group (MTWG)**

WRA Recommendations:

The Transmission Working Group scope primarily covers tariffs and policies. We recommend that it also, specifically cover transmission needs within the Markets+ utilities/states as well as transmission needs to other entities.

Working in conjunction with the Seams Working Group, the Transmission Working Group should evaluate existing transmission capacities, planned capacities, as well as future transmission that will be needed to cover expected future loads. Operational issues should also be included in this Working Group's scope.

➤ **Markets+ Resource Adequacy Working Group (RAWG)**

WRA Observations:

Resource adequacy (RA) will be a complex issue in Markets+ because there is no RTO, there may be an adjoining EDAM market, and the existence of Western Power Pool's (WPP's) Western Resource Adequacy Program (WRAP) covering the same footprint. The multiplicity of independent balancing authorities, utilities and transmission owners, along with these other macro entities will likely create operational issues that could jeopardize RA and broader reliability.

WRA Recommendations:

Utilities across the region are concerned with these issues and they should be specifically addressed in the RAWG scope of activities.

When a market is operating with WPP's WRAP, the above stated issues, both planning and operational, are very complex. For example, the following questions should be addressed in the scope: How is RA modeled by utilities, WPP's WRAP and Markets+? What are the operational interplays? How does Markets+ operate with the CAISO to improve RA, rather than creating more risks? There needs to be more detail in the RAWG scope of activities to adequately cover these additional issues.

➤ **General Comments: Open-Ended and Cross-Linking Topics**

WRA Recommendation:

There may be many open-ended topics that will arise through these stakeholder conversations. WRA proposes the above organizational groups consider addressing these issues and integrate them into the respective scopes as appropriate.

- What is the capacity that is available to run an efficient market?
- What is the actual state of the grid, possible transfer capacities, and what needs to be built, over time, to make the Markets+ footprint work as a pseudo-RTO?

B. Markets+ Phase One Development Process.

WRA continues to support the concerns raised and recommendations made in the Joint Comments submitted to SPP on March 17, 2023.¹ Because of time limitations, we focus our comments here on three issues.

1. Stakeholder Policies. Staff support is more critical than ever in a process with a condensed timeline, as are the stakeholder policies and procedures. Combined, these should enable equal access and opportunity for stakeholders, especially those with less resources, and maximize transparency. To this end we continue to advocate for specific policies and procedure:

- a. Apply the standard of posting meeting agendas seven days prior to meetings to all Markets+ organizational groups (not just the IMIP and MPEC).
- b. For all Markets+ organizational groups, post meeting materials at least five business days prior to meetings and ten business days prior to meetings for more significant or complex documents;
- c. Provide a sufficient period of time to develop comments on work products;
- d. Provide virtual access to all meeting;
- e. Record all meetings and provide access to the recordings on a public website;
- f. Maintain a well-organized and easy to use website with up-to-date information;
- g. Provide a user-friendly application to submit and review stakeholder comments; and
- h. Include in written proposals summaries of stakeholder comments and the basis for the recommendations made in the proposals

We recognize that SPP is recommending some of these policies and commend them for this. For example, it appears from the April 4, 2023 slide deck that SPP will be applying the seven- day meeting material posting standard to all organizational groups. However, we continue to advocate for *all* of the policies above and recommend that they are included in the charters.

WRA Recommendation: All of the policies and procedures above should be implemented and included in the charters.

The following is a specific recommendation in regard to f. above. Key documents and comments should be posted individually and in an accessible area of the webpage. In SPP, Inc. proposals and versions of proposals are not posted as individual documents. They are included in meeting materials with all of the other meeting materials; these zip files can be very large. So, for example, if a stakeholder wants to find a proposal or a version of a proposal, he/she must first

¹ Markets+ March 30, 2023 Update Meeting material at page 16, available at: <https://www.spp.org/documents/69042/phase%20one%20development%20update%202023%2003%2030.pdf>.

know it exists, then find out in which committee it was taken up and the date of the specific meeting, then download the zip file and search through all of the material. This is time consuming, hardly transparent and the system frustrates many stakeholders.

We are concerned that SPP staff is migrating this system into Markets+. Stakeholder comments on the Phase 1 development process were included in the March 30, 2023 meeting materials and they were not posted as a separate document on the SPP Markets+ site. In addition, to the problems described above, without knowing there was a comment opportunity, stakeholders would not even know there were comments available to review.

WRA Recommendation: Key documents such as proposals (including governance proposals), iterations of proposals and written stakeholder comments should be posted as individual documents and maintained in an accessible and easy to find location.

3. Meeting schedules. Few, if any organizations, will have separate staff assigned to each Markets+ organizational group (whether as a voting member of the group or participating as a general stakeholder). The opportunity to participate in real time provides participants the means to enter and influence the conversation and ask questions to ensure an accurate understanding of the issues and proposed recommendations. Given the pace suggested by the proposed schedule this is essential. Further, under the proposed expedited plan for Phase One, it will be a challenge for the Markets+ stakeholders to maintain a level of knowledge and information to participate responsibly in the process; having overlapping meetings will likely make this impossible for many organizations.

WRA Recommendation: WRA does not support any overlapping meetings of the Markets+ organizational groups.

3. Diversity.

WRA Recommendation: Give priority to diversity of membership on working groups and task forces. This includes not only expertise and geographic diversity, but also, sector, subsector, perspective and experiential diversity. We support statements to this affect included in the draft charters.

If you have any questions about these comments, please feel free to contact Vijay Satyal at the email below.

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