

September 16, 2026

Travis Kavulla
Administrator and Chief Executive Officer
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Regional Organization for Western Energy,
Inc.
c/o Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

Re: Building a Strong Regional Market Through Continued Collaboration

Dear Members of the ROWE Formation Board and Administrator Kavulla:

We have reviewed the Bonneville Power Administration's (BPA) September 3, 2026, letter outlining its expectations for regional governance, market independence, stakeholder engagement and long-term market durability.

We agree with the principles expressed by BPA.

Independent governance, meaningful stakeholder involvement, transparent decision-making and durable institutional structures will ultimately strengthen the market and benefit all consumers throughout the West.

Regional market solutions transcend the competing challenges facing investor-owned utilities and public power alike as we collectively transition the grid, manage extreme weather, address increasing demand and tackle broader affordability challenges. PacifiCorp's experience demonstrates the value regional market participation can deliver. Our participation in the Extended Day-Ahead Market (EDAM) is accruing customer benefits today and reinforces our conviction that broader market integration is the best path forward for the West.

The thoughtful leadership demonstrated by the Regional Organization for Western Energy (ROWE) and BPA is critical to building a more integrated and effective regional electricity market. ROWE and its stakeholders have made considerable progress on the principles BPA identified. The Step 2 proposal and subsequent formation activities reflect deliberate work on governance, stakeholder oversight and organizational design, informed by extensive collaboration among investor-owned utilities, public power, regulators, consumer advocates, independent power producers, market participants and other regional stakeholders. This work provides a strong foundation for a fully independent and durable regional organization.

BPA's transmission network, federal hydropower resources and operational expertise make it uniquely important to western market development. BPA's participation in EDAM would add significant regional value and strengthen the market through greater liquidity, transmission connectivity, flexibility and load and resource diversity.

We encourage BPA and ROWE to continue working collaboratively toward a common outcome. BPA has identified several areas where it would like to see additional development, including independent staffing, governance implementation, protections supporting organizational durability and continued evolution of the regulatory framework. These are reasonable objectives and should be prioritized. Creating a durable regional institution requires careful organizational development, thoughtful implementation and enough flexibility to ensure that structures are established correctly. ROWE's formation process has reflected that deliberate approach while maintaining momentum toward implementation.

We also support flexibility regarding implementation timelines where appropriate. The West has a generational opportunity to establish a true regional governance framework, and the quality and durability of that framework should remain the primary objective. The challenge before all of us is to strike the right balance between expediency and institutional rigor. We encourage ROWE to continue advancing the governance and organizational enhancements identified by BPA, and we urge BPA to remain actively engaged in refining and implementing those enhancements in a practical and durable manner. BPA's concerns are best addressed through partnership and collaboration that also recognizes and builds on ROWE's progress.

Resource adequacy, congestion revenue allocation and price formation are critical elements of a successful and durable regional market. We support continued stakeholder engagement on each of these issues and support BPA's active participation in those discussions. As these market frameworks evolve, a principled approach should be taken that promotes reliability, provides incentives for continued investment in generation and transmission infrastructure and ensures market participants are fairly compensated for the value they provide. Such an approach will help sustain long-term grid reliability, efficient market outcomes and broad regional participation.

The West has spent decades moving toward greater regional coordination. Before us is the opportunity to combine strong governance, meaningful stakeholder participation, independent oversight and robust market operations in a way that benefits consumers across the region. Success will require continued leadership, compromise and cooperation from all parties.

PacifiCorp stands ready to support that effort.

Sincerely,



Michael Wilding
Vice President, Energy Supply Management

cc: The Honorable James Danly, U.S. Department of Energy, Deputy Secretary of Energy
The Honorable Kyle Haustveit, U.S. Department of Energy, Under Secretary of Energy