Request for Comments on Principal Place of Business
REGIONAL ORGANIZATION FOR WESTERN ENERGY, INC.
October 27, 2026

Submitted by	Organization	Date Submitted
Ray Johnson, Deputy General Manager	**Tacoma Power**	**November 17, 2026**

Please use this template to provide your comments on the ROWE principal place of business assessment posted on October 27, 2026. Submit comments to comments@rowesternenergy.org by **November 17, 2026,** by 6:00pm MT/5:00pm PT.

General Comments

Tacoma Power ("Tacoma") appreciates the opportunity to comment on the ROWE's upcoming decision to establish a principal place of business. This decision will be one of many foundational decisions by the ROWE Board of Directors that will determine whether the ROWE increases the independence of governance over the multi-state energy markets operated by CAISO. California Assembly Bill 825 opened the door for potential increases in independent governance, but whether improvements occur will depend on decisions the ROWE Board of Directors and others, including the California Public Utilities Commission, make over the next year.

Multiple upcoming decisions will impact whether the ROWE will improve the independence of market governance, but the principal place of business is a meaningful one. It is a substantive decision, not symbolic one, because it will have long-term impacts on the relationship between the ROWE and CAISO personnel and the relationship between the ROWE and Western stakeholders. Tacoma encourages the ROWE Board to approach the decision with careful consideration of long-term impacts.

1. **What decision criteria should be used to determine the ROWE principal place of business?**

The criteria listed in the request for comments appear to be a useful framework for the ROWE Board and stakeholders to consider this issue. Without additional clarity about ROWE staffing, both in terms of initial leadership selection and longer-term funding and professional staffing levels, Tacoma does not have any recommendations to change the draft criteria.

2. **What metrics should be used to assess a location's value against each criterion?**

Tacoma does not have a specific recommendation for assessing each criterion against each potential location. The way the ROWE Board responds to stakeholder comments from across the Western US will be an early indicator of the degree to which the ROWE intends to operate independently of the influence of any single state.

3. **How should the criteria be weighted?**

Institutional independence and regional neutrality must be a top criterion. A principal place of business in California would be preliminary evidence that stakeholders should not expect independent governance from the ROWE. Similarly, operational proximity to CAISO should not be a highly weighted criterion. If the ROWE is intended to operate with a skeleton professional staff that will rely on CAISO employees for operational and logistical facilitation, then the hope for increased independence resulting from Assembly Bill 825 will have already been thwarted. The principal place of business should be chosen for long-term independence, not for short-term convenience.

4. **Among the locations listed above, does your analysis suggest a preferred location or an unacceptable choice and, if so, what factors support this assessment?**

Tacoma recommends Portland, Oregon as its preferred location. Portland rates well in all the criteria listed in the request for comments. It houses the headquarters of multiple large multi-state electric utilities, trade groups representing significant numbers of other electric utilities, and other organizations that are active in advocacy around issues impacting electric utilities. Those diverse organizations based in Portland attract a robust workforce that will be crucial if the ROWE is going to have sufficient independent professional staff to operate independently of CAISO.

Of the potential locations listed in the request for comments and for the reasons stated previously in these comments, Tacoma views Folsom, California as an unacceptable choice.