Request for Comments on Principal Place of Business

REGIONAL ORGANIZATION FOR WESTERN ENERGY, INC.

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Submitted by	Organization	Date Submitted
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1. What decision criteria should be used to determine the ROWE principal place of business?

WPTF recommends that ROWE locate its headquarters outside California and make institutional independence and regional credibility the leading considerations in selecting a location. ROWE's success depends on confidence among existing and prospective participants that it will govern in the interests of the broader West. The headquarters decision should help establish that confidence from the outset.

Physical location alone cannot establish independence, but it is a visible and lasting expression of institutional identity. Selecting a location outside California would help distinguish ROWE from CAISO and demonstrate its regional character. The convenience of locating near CAISO should not outweigh that objective.

Among locations that support this objective, ROWE should prioritize regional travel accessibility and the ability to recruit and retain qualified staff. It should also evaluate total ongoing costs, the legal and regulatory environment, and access to the current and prospective market footprint. Cost of living should inform workforce and cost assessments, without being counted twice as a separate advantage or disadvantage.

WPTF circulated a voluntary online survey to solicit member input on the headquarters decision. Respondents could participate anonymously; names and companies were optional. The November 8 export contains 87 submissions, including perspectives from trading and commercial professionals, regulatory and policy professionals, and executive leadership. Results are reported in aggregate without identifying respondents or their companies. Appendix A describes the survey and provides the full results summarized below.

Seventy submissions (80%) expressed greater confidence with headquarters outside California; 16 (18%) said location would not materially affect confidence and one was unsure. Independence and regional neutrality were selected as priorities in 59 submissions, regional travel ease and cost in 58, and recruitment and retention in 45. Only four selected proximity to CAISO. Regional travel accessibility was selected more than twice as often as personal travel convenience (28 submissions), suggesting a broader concern with participation across the region.

We highly recommend that ROWE should distinguish headquarters location from meeting location. Interestingly, fifty-three submissions (61%) favored a combination of headquarters meetings and regional rotation, and 10 (11%) favored generally rotating meetings. Only 19 (22%) preferred generally holding meetings at headquarters. Sixty-five submissions (75%) anticipated attending at least annually, assuming remote participation remains available. These findings support both a stable headquarters and opportunities for participation elsewhere in the region.

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

ROWE should publish a consistent comparison of candidate locations using the following measures. Where a criterion requires judgment, the Board should explain the evidence and reasoning behind its assessment rather than present an unsupported numerical score.

Institutional independence and regional credibility: Assess stakeholder confidence across current and prospective participants, including whether the location reinforces a distinct institutional identity and creates avoidable perceptions of dependence on CAISO or any single state or stakeholder. Evaluate the substance of stakeholder concerns alongside the distribution of survey responses.

Travel accessibility: Compare nonstop service and flight frequency from stakeholder origins, total door-to-door travel time, representative airfares, airport-to-office travel, hotel costs, and the feasibility of attending without an additional overnight stay. Airport size alone is an incomplete proxy. Include travel from prospective participating areas and test whether results change with different assumptions about the future footprint.

Workforce: Compare the available labor pool for ROWE's expected functions, compensation requirements, housing costs, recruitment experience for comparable positions, and willingness of prospective staff to relocate. Evaluate both an office-centered staffing model and a model that allows remote or hybrid work. ROWE should state its staffing assumptions before using this criterion to rank locations.

Total cost: Compare office, compensation, benefits, travel, professional services, and other recurring costs over a common planning period. Show one-time establishment costs separately.

Legal and regulatory environment: Use the planned outside-counsel review to identify material requirements, constraints, and costs for each finalist. The comparison should distinguish issues that would prevent effective operation from those that can be addressed through ordinary compliance measures.

Market presence and coordination: Consider access to the current and prospective market footprint without allowing the largest existing participant or state to dominate the result. For CAISO coordination, identify the functions that actually require in-person interaction and estimate their frequency and cost. Compare those costs with arrangements for remote coordination and periodic travel.

3. How should the criteria be weighted?

Institutional independence and regional credibility should receive the greatest weight. Travel accessibility and workforce should be the next priorities, followed by total ongoing costs, the legal and regulatory environment, and market presence. Proximity to CAISO should receive limited weight, reflecting demonstrated coordination needs rather than a general preference for physical proximity.

WPTF does not recommend deriving numerical weights from survey selection percentages, but we do believe they are indicative of general stakeholder sentiment. The Board should explain its weighting approach and test whether modest changes alter the preferred location. Short-term transition convenience should not determine a headquarters decision intended to serve ROWE for decades.

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?

WPTF recommends excluding Folsom and selecting headquarters outside California. Locating in the same city as CAISO would create an avoidable obstacle to establishing ROWE's separate identity. Even if ROWE maintains independent governance in practice, its headquarters should reinforce that independence in the eyes of the wider region.

Salt Lake City and Portland warrant particular attention in the shortlist. They were the most frequently selected locations for ease of attending an in-person meeting, with 49 and 45 selections, respectively, followed by Seattle with 33 and Denver with 27. Note the survey asked respondents to select up to three cities. Additionally, the survey did not ask respondents to choose a headquarters, just asked which would be the easiest to travel to, so this data is meant to help establish the best cities to evaluate for accessibility rather than represent an overall “winner.”

WPTF recommends comparing the leading outside-California candidates on actual travel access, staffing feasibility, and total costs before selecting a single city. A regional meeting rotation can address access needs that the headquarters location cannot satisfy on its own.

The survey is directional evidence of stakeholder priorities. Its voluntary participation and submission-level counts should be considered when interpreting the results.

Appendix A describes the sample, response handling, and limitations.

Appendix A Survey participation and results

WPTF used an online questionnaire to gather input for these comments. Participation was voluntary, and respondents could leave their name and company blank. Of the 87 submissions, 46 omitted both name and company and 51 omitted company. The results below are anonymized; optional identifying information is not disclosed.

Primary professional role

Response	Count	Share of 87
Trading / commercial / origination	41	47%
Regulatory affairs / market policy / government affairs	32	37%
Executive leadership / general management	10	11%
Legal / consulting	1	1%
Other	1	1%
Not provided	2	2%

Trading/commercial and regulatory/policy roles together accounted for 73 submissions (84%). The survey asked for professional role, not organization type, and does not establish a representative distribution among utilities, generators, marketers, public power entities, or other sectors. Optional company information was not used to weight responses.

Reported travel origins covered 10 Western states: Oregon (16), California (13), Washington (12), Arizona (4), Utah (4), Montana (3), and one each from Colorado, Idaho, Nevada, and New Mexico. Another 20 submissions listed other U.S. origins and two listed Canadian origins. Nine entered “Not applicable” or “N/A.” These are travel origins, not verified residences or company headquarters. Oregon and Washington together accounted for 28 submissions (32%).

Response handling: All 87 submissions are included and weighted equally. Percentages use 87 as the denominator and are rounded. Multiple-selection totals exceed 100%.

Survey results on independence and selection priorities

Effect of California versus outside California on confidence in independence

Response	Count	Share of 87
Greater confidence with headquarters outside California	70	80%
Location would not materially affect confidence	16	18%
Unsure	1	1%
Greater confidence with a California headquarters	0	0%

The outside-California finding was not limited to submissions from elsewhere: seven of the 13 submissions listing California travel origins expressed greater confidence with headquarters outside California; the remaining six said location would not materially affect confidence. This small subgroup is descriptive, but it indicates that the concern extends beyond personal travel convenience.

Factors selected as priorities for headquarters selection

Response	Count	Share of 87
Institutional independence and regional neutrality	59	68%
Ease and cost of travel for stakeholders across the region	58	67%
Ability to recruit and retain qualified staff	45	52%
Location within the current and prospective market footprint	33	38%
Convenient for me to travel to	28	32%
Total ongoing cost of operating ROWE	15	17%
Supportive legal and regulatory environment	13	15%
Proximity to CAISO for coordination	4	5%
No opinion	1	1%

The questionnaire asked respondents to select up to three priorities, or “No opinion” alone. The results identify the frequency with which each factor was selected; they are not ratings of its absolute importance.

Survey results on meeting locations and participation

Locations selected for ease of attending an in-person meeting

Response	Count	Share of 87
Salt Lake City, Utah	49	56%
Portland, Oregon	45	52%
Seattle, Washington	33	38%
Denver, Colorado	27	31%
Phoenix, Arizona	23	26%
Reno, Nevada	15	17%
Boise, Idaho	14	16%
Folsom, California	10	11%
Bozeman, Montana	5	6%
Albuquerque, New Mexico	4	5%
Cheyenne, Wyoming	2	2%

The question asked respondents to select up to three cities that would make attending meetings easiest. It did not ask for a headquarters preference. Salt Lake City received 49 selections despite only four submissions listing Salt Lake City or Utah as their travel origin. Portland received 45 selections, including all 16 submissions listing Portland as their travel origin. This suggests that Salt Lake City’s accessibility appeal extends well beyond local respondents, while also illustrating why the geographic composition of the sample matters.

Preferred approach to meeting locations

Survey results on past and expected attendance

Response	Count	Share of 87
Combination of headquarters meetings and regional rotation	53	61%
Generally hold meetings at headquarters	19	22%
Generally rotate meetings throughout the region	10	11%
No preference	5	6%

Trips to CAISO, WEIM/EDAM, or regional governance meetings in the past year

Response	Count	Share of 87
None	28	32%
1–2 trips	24	28%
3–5 trips	25	29%
6 or more trips	10	11%

Fifty-nine submissions (68%) reported at least one trip during the preceding 12 months, including 35 (40%) reporting three or more. The sample therefore includes both frequent in-person participants and people who had not recently traveled to these meetings.

Expected in-person ROWE attendance if remote participation remains available

Response	Count	Share of 87
3 or more times a year	20	23%
1–2 times a year	45	52%
Less than once a year	10	11%
Never; expect to participate remotely	3	3%
Unsure	9	10%

Sixty-five submissions (75%) anticipated attending at least once a year, including 20 (23%) expecting to attend three or more times. These are stated expectations rather than an attendance forecast. Together with the preference for regional rotation, they support evaluating the practical cost and time required to participate across the West while preserving remote access.

Open-ended responses raised several recurring considerations: perceptions of California influence; nonstop flights and airport-to-downtown access; the availability of qualified staff; the evolving market footprint; and the distinction between personal confidence in ROWE's independence and how others might perceive it. Views differed on the relative recruiting and political advantages of individual outside-California locations, but overwhelming additional comments emphasized support for an outside-California location.