TO: REGIONAL ORGANIZATION FOR WESTERN ENERGY, INC.

RE: Request for Comments on Principal Place of Business

Submitted by: Oregon Public Utility Commission & Oregon Department of Energy

November 17, 2026

We commend the ROWE board on their thoughtful approach and stakeholder outreach regarding the location for ROWE's principal place of business. We formulated our comments to adhere to ROWE's suggested template highlighting four questions.

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

We support prioritizing institutional independence/ regional neutrality as a critical criterion that will best set ROWE on a path to serving the broadest swathe of constituencies in the West. We highlight other criteria suggested in the ROWE's request for comments including market presence, existing workforce, travel ease and cost, and cost of living. These factors will aid in distinguishing between ROWE's list of potential locations. We understand that ROWE will rely upon CAISO for market operations, and we appreciate that Oregonians and Oregon Balancing Area Authorities participating in EDAM will benefit from the thoughtful investments in CAISO's Folsom, CA control room. We welcome fostering close coordination between CAISO's technical experts and ROWE as an essential element to EDAM's success but would emphasize that institutional independence and regional neutrality should outweigh "operational proximity to CAISO" considerations.

Among other criteria highlighted in this comment, we acknowledge that market presence embodies additional tension between ROWE independence and relevant workforce availability. We comment in the next section on how to best measure and balance the three criteria of institutional independence/regional neutrality, operational proximity to CAISO, and market presence.

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

We acknowledge the inherent conflicting nature between some of the suggested criteria. A headquarters located outside of California could serve as a simple, yet crucial, binary metric for gauging institutional independence and regional neutrality. This metric exists in tension with the potential preference of closer operational proximity to CAISO's Folsom control room. We also find that institutional independence and regional neutrality proximity metrics may also conflict with accessibility to a skilled, industry-relevant workforce, since the best sources of an industry-related workforce tend to be co-located with other regional organizations, federal agency offices, and balancing authority headquarters.

Ultimately, we would prefer that institutional independence/regional neutrality is assessed two-fold: the binary metric of inside/outside California; followed by a separate metric of proximity to other participants, other than CAISO institutions. We view proximity to other institutions/participants/non-participants as a potentially beneficial effect for workforce development and cooperation via market presence, instead of an impediment to independence and neutrality. We would prefer market presence metrics to include temporal considerations as well, not only of early participants but also potential future participants that have yet to commit to a day-ahead market, especially active WEIM participants.

Regarding workforce criteria, we suggest metrics include proximity to industry-relevant institutions (regional, federal, state, and corporate), higher education proximity (including legal, public policy, engineering, economic, and regulatory relevant colleges), and adequate skilled labor. We suggest that "travel ease and cost" metrics should be analyzed with the assumption of the ROWE's lofty regional service goal to broadly serve the West. We suggest various metrics for travel ease and cost to include an airport present within the city limits, with various threshold requirements such as number of flights per month (10k+/month), number of routes (250+), number of airlines hosted (50+), and access to public transit. Cost of living metrics can include a comparison of average home prices, electricity rates, etc.

3. How should the criteria be weighted?

We prioritize institutional independence/regional neutrality followed by market presence, i.e. proximity to key market participants in order to foster cooperation. We also highlight other secondary criteria such as workforce abundance, travel ease and cost, and cost of living. We acknowledge requisite coordination between CAISO's technical experts and ROWE is an essential element to EDAM's success and highlight the impressive investment in both technical infrastructure and expertise present within Folsom, CA, while emphasizing that independent governance from CAISO is an essential element that overshadows operational proximity to CAISO.

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?

We would welcome ROWE's selection of Portland, OR as its principal place of business, and foresee no issues with Salt Lake City, UT as another suitable location. Both locations strike a good balance between institutional independence/regional neutrality and the market presence benefits of multiple active participants, potential participants, and other relevant institutions co-located within these two metropolitan areas. These locations also provide value through their proximity to non-participant entities of regional significance, such as the Western Power Pool (in Portland, OR) and the Western Electricity Coordinating Council (in Salt Lake City, UT). Similarly, proximity to the Bonneville Power Administration's headquarters in Portland, OR could facilitate coordination, including on seams issues if BPA ultimately chooses to participate in Markets+. Both locations benefit from industry-relevant institutional co-location via existing workforces bolstered by robust higher education for future pools of expertise. Their international airports and public transit access each prove sufficient for the task. Each of these locations present relatively affordable cost of living standards when compared to other major metropolitan areas with sufficient transportation infrastructure. Thank you.