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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PacifiCorp appreciates the opportunity to provide perspectives on where the Regional Organization for Western Energy (ROWE) should establish its principal place of business. The decision is foundational for building confidence in the ROWE's independence and supporting its long-term success. Many stakeholders have stated the importance of the ROWE's principal place of business and so PacifiCorp appreciates the Board's prompt consideration of this important decision.

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

Each of the potential decisional criteria listed in the ROWE's request for comment is a useful consideration when determining the principal place of business. PacifiCorp's priority criteria include institutional independence, travel ease and cost, operating costs, and workforce. The principal place of business sends a strong signal to stakeholders about the independence of the ROWE, which is paramount as the ROWE works to distinguish itself. Next, the ability for stakeholders to be in-person for meetings allows a level of collaboration that is difficult to replicate on virtual meetings. Furthermore, while PacifiCorp believes it is important for the ROWE to be established as quickly as possible, it is also important to ensure that costs are taken into consideration to not overly burden market participants who will ultimately fund the ROWE. Lastly, it seems likely that the ROWE will eventually have staff members on site at the place of business. As such, being located where there is an existing talent pool, and where talent would be willing to relocate, will aid the ROWE in recruiting talent.

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

PacifiCorp recommends the following metrics for evaluation of potential decision criteria:

Institutional Independence/regional neutrality: The location should reinforce confidence in the ROWE's independence from any one stakeholder and support a regional identity. This criterion should be evaluated based on whether a location is closely associated with any particular market participant, state, or stakeholder interest.

Operational Proximity to CAISO: The location should be easily accessible by CAISO staff and allow for easy access to the CAISO to facilitate coordination. Physical proximity is less important than ease of

travel between the principal place of business and the CAISO. Relevant metrics could include the availability and frequency of nonstop flights, total travel time, and travel cost between the locations.

Travel Ease and Cost: Stakeholders should be able to easily access the principal place of business for in-person meetings. Relevant metrics should include the availability and frequency of nonstop flights to major Western cities, travel times, and travel costs.

Workforce: The ROWE should consider the available talent pool and ability to attract talent. Relevant metrics could include the availability of professionals with experience in utilities, wholesale electricity markets, law, finance, accounting, engineering, and information technology, as well as the ability to recruit and retain employees.

Cost of Living: The cost of living should also be considered as it may impact the ROWE's ability to attract talent. Relevant metrics could include housing costs, general living expenses, and state and local taxes.

Operating Costs: Operating expenses, office lease rates, meeting facility costs, and state and local tax rates should all be evaluated with consideration for the ROWE's anticipated long-term growth and evolving needs.

Legal and Regulatory Environment: The location should allow the ROWE to operate independently without known legal and regulatory impediments. Relevant considerations should include state corporate and nonprofit governance laws, employment requirements, tax treatment, and public records requirements.

3. How should the criteria be weighted?

PacifiCorp believes the greatest weight should be placed on institutional independence, travel ease and cost, operating costs, and workforce. PacifiCorp believes the least weight should be placed on operational proximity to the CAISO and market presence.

4. Among the identified locations, does the analysis suggest a preferred location, and what factors support this assessment?

PacifiCorp's preferred locations for the principal place of business are Salt Lake City, Utah, and Portland, Oregon. Both locations reinforce the ROWE's independence, are easily accessible for stakeholders across the West, and have existing talent pools of energy professionals. The locations likely differ in operating costs, legal and regulatory environments, and cost of living, which the ROWE Board should consider when making its decision.

PacifiCorp is not opposed to any of the locations listed in the request for comment. Based on PacifiCorp's priorities, however, some locations are preferable to others.