**Portland General Electric**
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November 17, 2026

RE: ROWE Request for Comments on Principal Place of Business

Submitted by: Portland General Electric (PGE)

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

Portland General Electric (PGE) appreciates the opportunity to comment on the selection of ROWE's principal place of business. This selection is a foundational decision that offers an opportunity to establish ROWE's institutional identity and strengthen stakeholder confidence. PGE appreciates the ROWE Board taking the time to make this decision with intention by listening to the various customers and stakeholders impacted by this decision. PGE supports the thoughtfulness of the Board's proposed decision criteria and recognizes the diverse pool of city options from across all western states. PGE supports the ROWE selecting a location that supports its development into a trusted, independent regional institution supporting reliable, safe and affordable power throughout the Western Interconnection

PGE recommends prioritizing institutional independence, regional neutrality, stakeholder accessibility, and the ease and cost of travel. The selected location should reinforce ROWE's identity as an organization serving the West rather than any individual state market participant.

Coordination with CAISO will be important, and physical proximity is less important than establishing a location that reflects broad western access to the ROWE. Already, CAISO has embraced a hybrid working model with employees from around the region, and this hybrid approach can also support collaboration with the ROWE Board and Staff.

Transparency bylaws require quarterly board meetings and open meetings; the location should account for availability of commercial office space and travel accessibility for geographically variant stakeholders and customers.

PGE also encourages the Board to adopt a remote-work model that supports recruitment across the West, reducing the extent to which workforce availability and employee cost of living depend on the headquarters location. By enabling a remote workforce, the ROWE can recruit and retain top talent from diverse regions around the west, strengthening the depth of regional understanding.

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

*Institutional independence and regional neutrality:* The extent to which the location reinforces ROWE's distinct institutional identity and supports confidence among stakeholders across the Western Interconnection.

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*Travel accessibility:* The number, frequency, and geographic distribution of nonstop flights from Western cities; the average travel time for stakeholders; and the availability of convenient flight schedules.

*Airport-to-meeting access*: Travel time and cost between the airport, headquarters, meeting facilities, and hotels, including access to reliable public transportation.

*Affordability:* Office lease rates, professional services, meeting facilities, airfare, lodging, and ground transportation, along with applicable state taxes and administrative costs.

*Workforce access:* The ability to recruit and retain qualified professionals through both local hiring and a geographically distributed remote workforce.

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

PGE recommends assigning the greatest salient weight to regional neutrality and institutional independence. ROWE has a unique opportunity to establish its governance operations in a centrally located, neutral location.

Travel accessibility should receive the next-highest weight. Accessibility should reflect the availability and frequency of nonstop flights from Western cities, total travel time, and convenient transportation between the airport and meeting facilities. The evaluation should emphasize equitable access for stakeholders throughout the Western Interconnection.

Affordability should be a consideration for effective long-term viability. The cost should be factor in accounting for both organizational operating costs and stakeholder expenses, including airfare, lodging, and ground transportation.

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

PGE supports Salt Lake City, Utah, and Portland, Oregon as the top candidates for ROWE's preferred principal place of business. Salt Late City has a central geographic location to western stakeholders and a major airport hub. Likewise, Portland, OR has a large energy industry community, with two EDAM Entities having their headquarters in downtown Portland. Both locations would help support long term institutional legitimacy with legal administration away from California.

First, locating ROWE outside California would provide a visible distinction between independent regional governance and CAISO's market operations. Physical separation from California provides an opportunity to gather on neutral ground and create independent organizational structure. Salt Lake City's existing role as home to WECC further supports its suitability as a Western energy hub.

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Establishing ROWE's governance operations there would help reinforce its identity as an institution serving the entire Western Interconnection.

Second, PGE views Salt Lake City's air connectivity and airport-to-meeting access as important advantages for convening stakeholders from across the West. Salt Lake City airport advertises 300 flights daily to over 100 nonstop destinations on 13 major airlines, emphasizing equitable stakeholder access. Downtown is 15 minutes away via public transportation.

Third, PGE considers Salt Lake City a promising option for cost-effective operations. If the need arises, Salt Lake City is home to several higher education institutions offering the possibility to recruit qualified staff from the region.

Portland, Oregon is also a leading candidate, particularly given its modern remodel of airport facilities and convenient transit connection between the airport and downtown. However, we acknowledge perceived regional independence and equitable stakeholder access as Oregon and California share many policy similarities and higher cost of living and tax burdens.

For Seattle and Denver, the Board should carefully consider airport-to-meeting travel times along with higher operational costs. While both of these cities offer large airports and diverse talent pools, the distance between the airport and downtown adds significantly to stakeholder travel time. This has been a common complaint regarding the CAISO's headquarters, which is at least a 45 minute drive from the Sacramento Airport. Smaller candidate cities should likewise be evaluated for whether limited nonstop service would create disproportionate travel burdens for stakeholders. Regional hub airports enable stakeholders to participate in person without spending the night, enabling lower barriers to in person participation and engagement. Cities without regional hub airports would raise barriers to participation.

PGE is fond of and appreciates the thoughtful inclusion of all the possible identified locations. Salt Lake City, UT or Portland, OR offer the most compelling balance of independent regional identity, stakeholder accessibility, and affordability from PGE's perspective.