Joint Comments on Principal Place of Business for
Regional Organization for Western Energy, Inc.
November 17, 2026

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

The Regional Organization for Western Energy, Inc. (ROWE) did a comprehensive job identifying the most important criteria to consider in determining the ROWE's Principal Place of Business (PPB).[1] The criteria and metrics are largely, if not entirely, based on the criteria and metrics developed by the Pathways Formation Committee.

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

The ROWE did a comprehensive job defining the metrics for each criterium. The description included with each criterium sets forth what would be considered in evaluating the criterium.

We have numbered the criteria 1-8 for easy reference and present for consideration these three additions to the metrics:

- **Consider co-location opportunities or proximity to an existing hub for related western regional convenings that may offer benefits that impact some of the eight criteria.** This is especially true for Criterium 3, Travel and Ease of Cost, and Criterium 6, Operating Costs. For example, holding time- and location-adjacent meetings attended by the same groups increases attendance and reduces costs for public employees and stakeholders and increases opportunities for in-person interactions. This is especially important for individuals that may not otherwise have the resources (time or money) to organize in-person meetings with ROWE staff or travel to solely attend a ROWE meeting. This has worked well for convenings of state policy makers and regulators which are held time- and location-adjacent the biannual CREPC

[1] ROWE Board, Request for Comments on Principal Place of Business, pages 1-4, available at: https://rowesternenergy.org/.

WIRAB meeting. It provides cost and time efficiencies for state officials, increases attendance and offers additional opportunities for in-person interactions with a broad range of stakeholders. Given that the ROWE PPC will be a static location, the benefits would be greater if co-located with, or located in proximity to, an established organization that has regular electricity-related regional convenings. We use WECC as an example below in the evaluation of Criteria 3 and 6.

- **Give substantial weight throughout to the impact on diversity, equity and inclusivity.** This is especially true for Criterium 3, Travel and Ease of Cost, which includes evaluating the costs to market participants and stakeholders, and Criterium 6 which we recommend include an evaluation of co-location which could be an efficient way to encourage and support in-person interactions with a broad and diverse group of stakeholders.

- **We recommend considering sensitivities of existing staff** as a metric in the most appropriate criterium, for example, Criterium 2, Operational Proximity to CAISO.

These metrics are explained further below as we recommend how they are applied to each criterium.

3. How should the criteria be weighted?

Criteria 2 and 4-8 should be given equal weighting with regard to the points remaining after allocation of points to criteria 1 and 3. Criterium 1should be given a larger percentage of points, with the option of vetoing a location that significantly compromises the Criterium. Criterium 3 should be given a larger percentage of points as it includes, among other things, the operationalization of the principles of inclusion, diversity and equity.

As an example of weighting, using 100 points as the maximum total value for the evaluation: Criteria 2 and 4-8 would each have a maximum value of 12, Criteria 1 and 3 would each have a maximum value of 14.

We provide further recommendations below, including how to apply the metrics of certain criteria.

1. **Institutional independence/regional neutrality.**

   This criterium should be given a significant value. Further, if a location negatively impacts this criterium in a significant way, even if just in perception, that location should not be considered.

   It is likely that co-location with CAISO, in direct financial benefits, efficiency and a number of other ways may significantly outweigh the benefits of other locations.

However, it is a legitimate position to determine those benefits do not outweigh the perception of independence and regional neutrality. We are in the "building trust" stage of market development and a primary goal of the ROWE is to increase the footprint of the energy markets to maximize the economic, reliability and environmental benefits. It appears this criterium is playing a key role in this goal.

There are significant economic, reliability and environmental benefits associated with a larger market footprint. Although, it is hard to measure how much this criterium will impact market participation and thus the economic, reliability and environmental benefits, it is clear from comments of potential participants it is quite important.

At this stage in the ROWE's development, it is of the highest importance that the location is considered neutral and not suffer even the perception of bias from any sector. This applies to all locations being considered.

2. **Operational proximity to CAISO.**

As described in the solicitation for comments, this is an all or nothing score. For example, if the scoring is 1-10, Sacramento/ Folsom would get a 10 and all other options would get a 0. There does not appear to be any ***operational*** proximity benefit whether the PPC is in Reno or Boise, even though some of the other criteria scores will be impacted by their distance from/proximity to the CAISO Campus.

We recommend including sensitivities of current staff as a metric for evaluation of the PPB. If it is included in this criterium, there should be some point allocation based on this metric.

3. **Travel ease and cost.**

The metrics for this criterium include consideration of costs borne by stakeholders, as well as the ROWE Board members. "Because Board members, stakeholders, market participants, and staff will travel from throughout the Western Interconnection, headquarters should be readily and cost effectively accessible by commercial air service."[2] **Consideration of costs to stakeholders is key to manifesting the principles of diversity, equity and inclusivity. We recommend that the metrics for this criterium clearly state this.**

In furtherance of these principles, we also recommend the metrics include an evaluation of co-location or proximity opportunities.

[2] ROWE Board, Request for Comments on Principal Place of Business, at 2, *Travel and Ease of Cost* paragraph.

As set forth above in our response to Question 2, co-location with, or proximity to, an existing hub for western regional convenings could offer substantial benefits. An example would be the Western Electricity Coordinating Council (WECC) located in Salt City, Utah. WECC is the approved Regional Entity (RE) for the Western Interconnection. As such, they hold numerous regional meetings related to their mission and purpose. Further, they house WestConnect and hold regional meetings related to WestConnect's mission and purpose. Over the years they have served as a neutral location for regional stakeholder meetings on western electricity related issues. Most recently CAISO and SPP are jointly hosting public workshops on market seams at WECC.

The benefits of co-locating or locating in proximity to WECC (or a similar organization in a different location) are numerous.

If the ROWE PPB is co-located, or in proximity to, an organization like WECC which hosts numerous regional meetings on electricity related issues, it will increase access to ROWE staff by those attending the regional convenings. For groups like tribes and public interest organizations (PIOs), who have few, if any, resources to interact in-person with ROWE staff, this can offer a valuable opportunity.

Holding ROWE meetings time- and location-adjacent to meetings hosted by other organizations that also draw ROWE stakeholders provides efficiencies to stakeholders in both time and money. For some stakeholders, like PIOs and tribes, it could possibly provide the only opportunities of in-person engagement with the ROWE because of resource limitations.

These benefits would also be enjoyed by the market participants, state employees and other sectors.

An evaluation of co-location would also impact operating costs and should be considered as one of the metrics for that criterium (Criterium 6). It may be possible to negotiate with WECC the use of some facilities at no or low cost. Some examples of this include meeting space for ROWE working groups, public Board meetings, or other large meetings and possibly subletting space for ROWE staff, etc.

We have no special knowledge of these potential co-location opportunities nor have we discussed this with WECC. This is just an example of co-location opportunities that we recommend the ROWE Board consider.

4. **Workforce.** No further comment at this time.

5. **Cost of living.** No further comment at this time.

6. **Operating Costs.**

   We recommend considering co-location or proximity benefits as one metric for evaluating this criterium.

   Co-location can provide an efficient opportunity to encourage and support diversity, equity and inclusivity. See response to Question 3.

   Co-location could provide opportunities to reduce operating expenses. See response to Criterium 3.

7. **Market presence.** No further comment at this time.

8. **Legal and regulatory environment.** No further comment at this time.

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?

Accessibility is very important to PIOs; this includes encouraging opportunities for in-person engagement by less resourced groups like PIOs and tribes. Without having the resources to do an evaluation of the all of the criteria, or a detailed comparison of any of the criteria, we represent here our location preferences for additional consideration by the Board. This is based on a high-level application of some of the criteria to the locations published in the ROWE's PPC Request for Comments. This in no way reflects anything negative about the other locations and can be influenced by information from the Board's detailed review that is to come.

- Boise, Idaho
- Denver, Colorado
- Phoenix, Arizona
- Portland, Oregon
- Reno, Nevada
- Salt Lake City, Utah
- Seattle, Washington