Request for Comments on Principal Place of Business
REGIONAL ORGANIZATION FOR WESTERN ENERGY, INC.
October 27, 2026

Submitted by	Organization	Date Submitted
Ashley Morey and Alisa Kaseweter	**Bonneville Power Administration**	**November 16, 2027**

Please use this template to provide your comments on the ROWE principal place of business assessment posted on October 27, 2026. Submit comments to comments@rowesternenergy.org by **November 17, 2026,** by 6:00pm MT/5:00pm PT.

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

Bonneville generally supports the decision criteria listed in the October 27 request for comments with the exception of the "operational proximity to CAISO" criteria, which should not be a decision criteria. The ROWE is tasked with providing independent governance of voluntary markets across the broadest possible western footprint; it would be inconsistent with the "institutional independence/regional neutrality" objective to treat proximity to the CAISO as a determining factor in locating the ROWE's principal place of business. The "travel ease and cost" criteria should consider travel ease of all stakeholders and the vendor for market operations in considering ROWE's principal place of business.

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

No comment.

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

Of utmost importance to BPA is the "institutional independence/regional neutrality" criteria. Specifically, ROWE's principal place of business should instill confidence in ROWE's independence from CAISO and California interests. Travel ease and cost to/from major airport hubs within the EDAM footprint throughout the year is also an important factor. The other criteria, while relevant, are of lesser importance.

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?**

Bonneville opposes the ROWE's principal place of business being in Folsom or any other California location, which would create real and perceived lack of institutional independence and regional neutrality from California. Bonneville supports an intermountain west location that is reasonably easy to reach to instill trust in west-wide regional neutrality. Once potential locations are narrowed to a short list, the Board may consider soliciting input from local economic development offices regarding the benefits of locating ROWE headquarters in the area.