November 16, 2026

Via E-mail: comments@rowesternenergy.org

Regional Organization for Western Energy Board

Re: Request for Comments on Principal Place of Business

Submitted by	Organization	Date Submitted
Idaho, Utah, and Wyoming	OSMEC / OED / WEA	November 17, 2026

The Idaho Governor's Office of Species, Minerals, and Energy Coordination (OSMEC), Utah Energy Development (OED), and Wyoming Energy Authority (WEA) appreciate the opportunity to comment on the Principal Place of Business for the Regional Organization for Western Energy (ROWE). The continued participation opportunities and commitment to a transparent process are greatly valued during the development of ROWE's independent, neutral, and trusted organization structure. The selection of ROWE's headquarters should reinforce those principles; we jointly offer the following comments on place of business.

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

We agree with and underscore the need for regional neutrality in the decision criteria, no single consideration should outweigh the need to establish institutional independence. The location chosen should reinforce ROWE's independence from any single market participant, state, or any particular stakeholder. We would strongly recommend a location outside of California to prevent any appearance of favoritism or bias towards California or the California Independent System Operator (CAISO). This concern is adjacent to operational proximity, we believe the target should be a location with ease of air travel access for CAISO staff to facilitate the necessary robust engagement. If the initial need for coordination is great enough, a small Folsom liaison office may be appropriate.

The other proposed decision criteria are a good balance between practicality and principal. Proximal location to major airline hubs with either multiple transportation options or short travel distances to the Place of Business is desirable. Workforce across the energy sector will be important, we would emphasize expertise and relevancy in any staffing, and encourage the use of remote work to widen the net of potential candidates across the Western footprint.

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

Of equal importance to the metrics themselves, the Board should disclose the data and methodology used in any selection. For the proposed criteria categories, we commend ROWE on their thoroughness and thoughtfulness. Properly documented, the existing list of metrics with each category should allow for a robust ranking and discussion among the proposed locations. We do offer the following additional metric recommendations:

Operational proximity to CAISO: Exposure of both organizations to the same environmental or power disruptions; total travel time to CAISO; the frequency/nature of functions that require in-person coordination

Travel ease and cost: Airport and flight reliability; same-day trip feasibility from regional stakeholders; and airport to city-center travel time

Workforce: Where available, the number and concentration of workers in relevant occupations; prevailing wages; and workforce experience in utilities, markets, or balancing authorities

Operating costs and cost of living: Cost and time to establish independent legal, HR, IT processes; housing cost burden at expected ROWE salary bands; housing and cost growth trend; relocation cost

Market presence: Western utility and balancing authority presence; proximity to participating or potential future participating entities and states

Legal and regulatory environment: outside counsel's assessment of material legal barriers or costs associated with nonprofit governance, employment, taxation, public records, liability protection, and administrative compliance.

3. How should the criteria be weighted?
As highlighted in our comments, we propose that independence and neutral, transparent operation are the most important criteria for the long-term success of ROWE. We offer the following as a potential weighting of the proposed criteria, but agree with and stress that this needs to be a holistic process: A legal barrier may justify removing a location regardless of its score, modest operating cost differences should not outweigh large differences in accessibility or workforce availability.

Criteria	Weight	Reason
Institutional independence/regional neutrality	30%	Protects ROWE's legitimacy by avoiding actual or perceived institutional capture.

Operational proximity to CAISO	5%	Supports initial ROWE-CAISO transition
Travel ease and cost	10%	Enables routine participation by states, staff, market participants, and stakeholders.
Workforce	10%	Supports recruitment and retention of the specialized expertise needed.
Cost of living	5%	Affects employee recruitment, relocation, and retention; can be mitigated through remote work.
Operating Costs	10%	Controls long-term facilities, systems, professional-services, and administrative expenses.
Market presence	15%	Connects ROWE to current participants and future market growth.
Legal and regulatory environment	15%	Addresses legal conditions that could impede transparent and independent operation.

4. Among the locations listed, does the analysis suggest a preferred location or an unacceptable choice and, if so, what factors support this assessment?

Of the listed potential locations, we recommend against Folsom, California, as ROWE's principal place of business. ROWE's necessary reliance on CAISO during formation is exactly why permanent co-location would create independence concerns and the appearance of undue influence. We believe ROWE can address the highlighted initial necessary coordination through regular travel, robust communication, or a limited liaison presence near CAISO without making Folsom its permanent headquarters.

We jointly recommend Boise, Salt Lake City, and Cheyenne as strong candidates for ROWE's principal place of business. All are Intermountain West state capitals located outside California and physically separate from the incumbent market operator. Each offers practical air access through their major airports, proximity to state and utility decision-makers, university training pipelines, and a professional workforce capable of supporting ROWE's legal, financial, technical, and administrative functions. All cities are home to energy system participants being the homes of utilities, think-tanks, government, and, in the case of Salt Lake City, the home of the Western Electric Coordinating Council (WECC). All states also sit at important transmission interfaces. Idaho connects the Mountain West with the Pacific Northwest and is developing stronger ties to the Desert Southwest, while Utah and Wyoming's transmission systems link the central Mountain West and include major corridors toward Nevada, the Desert Southwest, and California. The presence of the Western Electricity Coordinating Council within Salt Lake gives all locations close access to expertise in regional reliability

Finally, the state energy offices recommend that ROWE publish its adopted criteria, metrics, weights, and scoring before issuing a decision. A transparent and consistently applied process will strengthen confidence in the result regardless of eventual location. As our states have emphasized throughout the ROWE governance process: independence, transparency, and consideration of state policy are foundational to a durable Western market institution. The place of business decision and process should reflect those principles.

Our states appreciate the opportunity to provide these comments and look forward to continued engagement with ROWE, the Western states, market participants, and other stakeholders.

Sincerely,

Rob Creager

Rob Creager (Nov 17, 2026 14:59:38 MST)

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Mike Edmondson (Nov 17, 2026 15:03:28 EST)

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