Response to Request for comments on Principal Place of Business
REGIONAL ORGANIZATION FOR WESTERN ENERGY, INC.
November 24, 2026

The selection of ROWE's principal place of business is a foundational governance decision that will influence the organization's operational effectiveness, institutional identity, and legal administration and will influence stakeholder confidence in ROWE's independence, regional character, and long-term institutional legitimacy. Unlike existing Regional Transmission Organizations, which generally inherited their headquarters from predecessor organizations, the ROWE has the unique opportunity to intentionally select a headquarters location at formation.

The ROWE will undertake broad consideration of locational value in selecting ROWE's principal place of business. Some locations maximize operational coordination with existing market administration, while others may better reinforce ROWE's regional independence and governance neutrality. Cost considerations, institutional continuity, workforce, ease of transportation access, and customer location also are significant factors in making this decision. The appropriate location will ultimately depend upon the relative weight the ROWE and stakeholders assign to these and other potential complementary objectives.

Proposed Review & Decision Schedule

The principal place of business decisions may be one of the most visible indicators to the West of ROWE's independence. It is thus at the same time pressing and deserving of careful consideration. The Board plans to onboard a Chief Executive Officer and General Counsel in January 2027. The schedule has been updated to reflect their participation.

Board Discussion of Comments	November 24, 2026 public meeting
Discussion of options with CEO and GC	January or early February 2027
Release of location shortlist	January or early February 2027
Preliminary Record of Decision	March 2027
Comments on Preliminary Record of Decision	March 2027
Final Record of Decision	April 2027

Summary of Stakeholder Responses

Stakeholders supported the decisional criteria proposed by the Board. Institutional independence and regional neutrality are the dominant considerations. Other important considerations were travel ease and cost and workforce availability. Operational proximity to CAISO and legal and regulatory environment were of the least concern. Stakeholders also expressed the need for the principal place of business to accommodate the anticipated evolution of the ROWE to the extent practicable and should consider remote or hybrid workforce options.

The leading cities suggested were Portland and Salt Lake City. Folsom was mentioned as a non-starter for multiple entities.

A comment summary matrix is provided below on pages 3-5.

Stakeholder	Preferred Location	Priorities	Other Considerations
Bonneville Power Administration	Intermountain West	• Institutional Independence • Travel ease/cost	• Operational proximity to CAISO should not be a criteria • Board should solicit input from local economic development offices
California Public Utilities Commission (CPUC) Energy Division Staff	Folsom (interim)	• Operating Costs • Operational Proximity to CAISO • Market Presence • Institutional independence & regional neutrality	• Revisit the location once ROWE's governance, staffing, responsibilities, and market footprint are more established.
Joint Public Interest Organizations	Unranked, 7 cities suggested	• Institutional independence & regional neutrality • Travel ease & cost	• Opportunities to co-locate with existing Western energy organizations. • Diversity, Equity, and Inclusivity (DEI): Give substantial weight to impacts on DEI, particularly concerning travel costs and stakeholder accessibility. • Existing staff sensitivities
Northern California Power Agency (NCPA)	Folsom (Interim)	• Operational effectiveness during formation and initial operations • Cost, avoidance of duplication, implementation risk • Regional accessibility and stakeholder participation	• Consistency with the Step 2 Design • Preserving the ability to reconsider as ROWE and EDAM mature.
NRU	Portland or Boise	• Independent governance & equitable market rules	• Particularly favors Portland because of its concentration of public power organizations, major utilities, and the Bonneville Power Administration (BPA)
OR Public Utilities COmmission & OR Department of Energy	1. Portland 2. SLC	• Primary: institutional independence & regional neutrality • Secondary: market presence • Tertiary: existing workforce, travel ease and cost, and cost of living	• Independent governance from CAISO is emphasized as overshadowing operational proximity.
PacifiCorp	Portland or SLC	• Institutional independence & regional neutrality	• Least weight should be placed on operational proximity to the CAISO

		• Travel ease and cost • Operating costs • Workforce	and market presence.
Portland General Electric (PGE)	SLC or Portland	• Institutional independence, regional neutrality • Stakeholder accessibility, and the ease and cost of travel.	• 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.
Public Power Council (PPC)	(not stated)	• Interaction between institutional independence and operational proximity to CAISO • Reliability and affordability	• Lists questions for the ROWE about: • ROWE's long term vision for staffing • Hiring of CEO & GC • Structural and legal elements—along with the nature of ROWE's reliance on CAISO staff—will ultimately dictate true independence rather than just physical location. • Supports BPA's request for a committee to select the PPB
Public Service Company of New Mexico	1. SLC 2. Portland 3. Phoenix or ABQ	1. institutional independence and regional neutrality; 2. travel ease and cost; 3. operational proximity to CAISO; 4. workforce; 5. cost of living; 6. market presence; 7. operating costs; and 8. the legal and regulatory environment.	• Proximity to CAISO should be treated as a transitional factor that does not outweigh long-term independence.
Puget Sound Energy (PSE)	1. Portland 2. Denver, SLC, Seattle	1. Institutional Independence 2. Workforce 3. Travel Ease and Cost 4. Cost of Living 5. Operating Costs 6. Proximity to Regional Stakeholders 7. Market Presence 8. Legal and Regulatory Environment 9. Operational proximity to CAISO	• Enable long-term growth, encourage stakeholder participation, as well as maintain both the perception and practice of institutional independence.

Tacoma Power	Portland	• Institutional independence and regional neutrality	• Folsom is unacceptable • Operational proximity to CAISO should be the lowest
Western Power Trading Forum (WPTF)	SLC or Portland	• Highest priority: Institutional independence and regional credibility. • Next: Regional travel accessibility and workforce recruitment and retention. • Subsequent considerations: Total ongoing costs, legal and regulatory environment, and market presence. • Limited weight: Operational proximity to CAISO, based only on demonstrated coordination needs.	• Conducted a member survey of 87 submissions.
WY Energy Authority *ID Governor's Office of Species, Minerals, and Energy Coordination (OSMEC), UT Energy Development (OED)*	Boise, SLC, Cheyenne	(30%) Institutional Independence & regional neutrality (15%) Legal and regulatory environment (15%) Market presence (10%) Operating Costs (10%) Travel ease & cost (10%) Workforce (5%) Operational proximity to CAISO (5%) Cost of living	• If the initial need for coordination is great enough, a small Folsom liaison office may be appropriate. • The Board should disclose the data and methodology used in any selection.