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

Submitted by	Organization	Date Submitted
Lauren Tenney Denison	**Public Power Council**	**November 17, 2026**

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.

General Comments

PPC appreciates that the ROWE is considering independence as it evaluates its principal place of business. As part of this assessment, it is appropriate to consider the important dependency between ROWE and CAISO that must be acknowledged and considered. PPC supports a ROWE headquarters that is not located in California, but we also acknowledge the importance of collaboration and access between leadership at the ROWE and those carrying out the ROWE's vision and purpose. Thus, it will be important to consider how the ROWE and CAISO will be organized and staffed as a part of the "Institutional Independence/Regional Neutrality" and "Operational Proximity to CAISO" decision criteria. A location away from the CAISO may improve the perception of independence, but other key factors – including the nature and extent of the ROWE's reliance on CAISO staff – are likely to have a greater effect on the ROWE's independence.

With this in mind, there are questions that we suggest the ROWE consider to better inform how it measures the "Independence" and "Operational Proximity" decision criteria and how it weighs those as part of this decision.

1) What is the ROWE's longer term vision for staffing? Will the organization be staffing up such that ROWE employees will be running stakeholder processes, writing draft policies, and supporting FERC filings? Or will these functions be performed by CAISO staff under a contractual agreement with ROWE?
2) We understand that the ROWE CEO is likely to be hired in advance of a selection of a principal place of business. Does this mean that the expectation is that individual will largely be working remotely? Or will they have an "in-office presence" at the ROWE HQ? Is the same true for other key staff such as the ROWE General Counsel?

We would appreciate you addressing these questions in your deliberations and thank you for the opportunity to comment.

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

The decision criteria listed above appear well considered and robust. PPC would like to ensure that reliability and affordability are adequately encompassed in the criteria described above and would appreciate that any risks to those objectives be highlighted as alternatives are considered. Independence is also a key consideration for PPC. As discussed in our general comments, changes that alter the perception of independence can be meaningful, but our evaluation of independence will be based on the structural and legal elements of the ROWE. We ask that the ROWE address how different options achieve these objectives in its assessment.

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

For the purposes of generating a short list, a ranking of high, medium, and low ability to meet each criterion would be helpful. We acknowledge that assessments of many of the criteria will be subjective and/or qualitative. Quantitative estimates are helpful as available.

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

As addressed above, additional context on the ROWE future state would be helpful to provide perspective on the appropriate weight of each criterion.

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?**

At this time, PPC would like to better understand the future vision of the ROWE to better inform our feedback. Additionally, we would request that the ROWE consider the recommendation made by the BPA Administrator in his September 3 letter to "establish a committee to select a headquarters and principal place of business outside of California, a committee which includes market participants such as Bonneville whose operations span multiple states."