

July 10, 2026

Attn: West-wide Governance Pathways Initiative Launch Committee

Re: Puget Sound Energy Comments on June 29, 2026 ROWE Stakeholder Process Narrative

Puget Sound Energy (“PSE”) appreciates the opportunity to comment on the Regional Organization for Western Energy (“ROWE”)’s Stakeholder Process Narrative¹ (“Process Narrative”). Generally, PSE supports the use of the North American Electric Reliability Corporation’s standards development to frame the process. Transparency, Consensus Building, and Fair Balance of Interest are critical to building confidence in the stakeholder process. PSE recognizes that the stakeholder process is still under development however, the Process Narrative raises a few concerns related to Roadmap approval timing, significant decisional authority for staff in being able to adjust the Roadmap even after it has been approved, and uncertainty around how exigent circumstances are determined.

Under Board Consideration of Catalog and Roadmap the Process Narrative notes that the ROWE board must formally vote to adopt the Roadmap. The Process Narrative provides information on what information the board will be provided prior to the vote, but the Process Narrative does not outline what happens to a Roadmap that is not approved, either in full or in part. Would the Roadmap go into the remand process? Would the ROWE continue to use the last approved Roadmap? Based on the timing within the Process Narrative, the ROWE board would see and vote on the Roadmap in December meeting. This means a remand or adjustment process on all or a portion of a voted down Roadmap would have a month or two before it would begin to overlap with the Roadmap process for the following year. The Launch Committee should outline what a Board rejection of the Roadmap, either in full or in part, would involve, including it within the remand process in a future draft of the Process Narrative.

Another concern with the Process Narrative is that it grants staff authority to unilaterally modify the prioritization of initiatives in the Roadmap after a Board vote of approval. This grants staff overly expansive authority over the Roadmap process and subjugates the authority of the ROWE Board. Additionally, it is inconsistent with the “staff functions” outlined on page 13 of the Process Narrative which assign a purely administrative role to staff. The only limit on this ability is that staff must notify the ROWE board and take comments at the next public meeting when it does so, with no requirement for what happens after those comments. This essentially gives staff the final say on the prioritization of initiatives, which could be changed shortly after a ROWE board vote as the modifications can happen at any time. Wanting to preserve flexibility for staff is reasonable, but it also needs to recognize the position of the Board as the ultimate oversight role

¹The Process Narrative is published here: [JunePUBLIC_StakeholderProcessNarrative](#)

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of the market. As such, the Launch Committee should update the Process Narrative to include an additional step that puts a modified Roadmap back before the ROWE board.

PSE suggests the following modifications to the Process Narrative. Should staff modify the prioritization of a Roadmap approved by the ROWE board, staff must notify the ROWE Board, the SRC, and the Office of Public Participation in writing and conduct a stakeholder meeting at least seven days before the next ROWE Board public meeting to explain what was changed and take comments at that meeting. Following the stakeholder meeting, the SRC should conduct an indicative vote to gather stakeholder positions on the modifications, which will be provided to the board along with an updated Roadmap prepared by staff. The modified Roadmap will go on the consent agenda of the public meeting, which can be removed from the consent agenda by a ROWE board member for a formal vote if a member desires. This will preserve the Board's role as final approver and oversight, maintain the ability for staff to be flexible in allowing modifications to move through consent agenda while retaining SRC's opportunity for input, and improve transparency by requiring changes to an approved Roadmap be documented and reapproved.

Finally, the Process Narrative lacks criteria for establishing "exigent circumstances" that would preclude the development of a problem statement. Problem statement formation is the formative first step of issue evaluation. Development involves identifying the objective of a stakeholder initiative and what issues it is trying to solve. The Process Narrative identifies that two circumstances will grant the ability to bypass development of a problem statement, exigent circumstances and a pre-existing well-defined problem statement. The Process Narrative states that a well-defined problem statement is determined by consensus through a stakeholder vote, but does not specify how exigent circumstances are decided, whether by staff or stakeholder vote. This lack of specificity creates uncertainty in the process and has the potential to weaken the role of stakeholders by giving undefined parameters for staff to make an exigent determination. The Launch Committee should detail who has the authority to determine exigent circumstances. This should be a similar method to bypassing development due to a well-defined problem statement and be determined by a majority indicative stakeholder vote. The circumstances and reasoning for exigent circumstances should be documented and presented to the board as part of the record of the initiative.

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Please contact Cameron Reed at john.reed@pse.com or (425) 588-9785 for additional information about these comments. If you have any other questions, please contact me.

Sincerely,

/s/ Jessica Zahnow

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