

Comments of the Bonneville Power Administration on the ROWE Stakeholder Process Narrative published June 29, 2026

Submitted by Ashley Morey (almorey@bpa.gov) and Alisa Kaseweter (alkaseweter@bpg.gov)

First, Bonneville appreciates the efforts of the ROWE Formation Board and Pathways Launch Committee in preparing the proposed ROWE Stakeholder Process Narrative. This document reflects stakeholder input from both the Pathways and RIF Enhancements public processes, and will be helpful for the incoming ROWE Board. Bonneville continues to support a number of elements that appear in the proposal, including indicative voting, reports by the SRC to the Board, and ability to assign multiple stakeholder sponsors to a given initiative.

Second, as a general matter, Bonneville reiterates its emphatic support for transparency and constituent access to decision makers. These principles will be supported by notice of meetings and workshops; broad access, including though web-based attendance, in-person attendance in economical venues, avoiding attendance fees, recordings, and archives; and adequate periods for comment. Further, limitations on public access, such as to protect proprietary information and for discussion of personnel and litigation matters, should be specific and limited.

Third, the ROWE stakeholder process should be ROWE driven, not CAISO-staff driven. While the Stakeholder Process proposal states, “In instances where CAISO staff does have a role, it will be under the direction of ROWE staff,” (p.2), the general conflation of ROWE staff and CAISO staff contributes to the appearance that ROWE is not a fully independent entity. Bonneville has long advocated for complete independence for the regional organization, and ROWE has an opportunity to demonstrate independence by facilitating its own stakeholder process responsive to the needs of its larger, regional constituency.

Fourth, Bonneville offers the following specific comments on the ROWE Stakeholder Process proposal:

- (a) In the “Triage and Classify Initiatives” phase of the Catalogue and Roadmap Development Process (p.6) and in the Stakeholder Initiative phase, it would be helpful for staff to identify processes that might be better suited for the Business Practice change process. The Business Practice change process is an existing alternative avenue for addressing desired market changes that may be narrower in scope. In the ROWE Stakeholder Process proposal, there is no real mention of this lighter weight alternative to the stakeholder process, and it would be beneficial to explicitly include this alternative.

- (b) With regard to the Updated Roadmap from the previous year (p.9), Bonneville suggests including status updates for initiatives, including whether prioritization has changed and, if so, why and whether the SRC and ROWE Board has been notified.
- (c) With regard to Draft Roadmap Development (p.11), Bonneville supports expanding the role of the SRC, specifically by changing “staff *may* also coordinate with SRC” to “staff *will* coordinate with SRC.”
- (d) Bonneville believes it would be helpful to represent in some way a summary of which sectors’ priorities appear to be well represented relative to other sectors. This could be included in the Draft Roadmap (p.12).
- (e) Bonneville suggests specifying who will vote on the Final Roadmap (p.13).
- (f) Bonneville appreciates the ability for two stakeholders to act as initiative sponsors and the ability to create work groups. In both of these scenarios, it would be helpful to emphasize the benefits of incorporating stakeholders from different sectors. This would help to drive consensus and meet the needs of a more diverse set of stakeholders. While Bonneville does not suggest this should be mandatory, it would be beneficial to explicitly include this principle.
- (g) In the past, Bonneville has supported staff solicitation of stakeholder position statements. Bonneville continues to support this approach as a way to generate consensus among sectors and development of issue statements and proposals. Particularly in the Stakeholder Initiative phase, Bonneville suggests including this tool in the ROWE Stakeholder Process.