

**Joint Comments on
Regional Organization for Western Energy (ROWE)
Office of Public Participation (OPP)
May 8, 2026**

Submitted via email to Pathways@WestWidePathwaysInitiative.org and Comments@WestWidePathwaysInitiative.org.

Introduction

The NW Energy Coalition, Western Resource Advocates, the Union of Concerned Scientists, Environmental Defense Fund, Natural Resources Defense Council, the Sierra Club, and Renewable Northwest (collectively, the “Joint Commenters”) appreciate the opportunity to provide feedback on the Statement of Work (SOW) for the Office of Public Participation (OPP). Our organizations have long advocated for a grid that is reliable, affordable, and centered on the public interest. We view the creation of the OPP as a foundational step in ensuring that the Regional Organization for Western Energy (ROWE) fulfills its commitment to independent governance that is inclusive of all voices.

Support for the OPP Mission

We strongly support the mission of the OPP to “empower, promote, and support public voices in ROWE processes.” For too long, technical barriers and a lack of resources have acted as hurdles for individuals and non-profit groups seeking to engage in complex regional market issues. By providing “accessible, reliable, and neutral explanations,” the OPP will play a critical role in addressing these capacity barriers and fostering a more equitable stakeholder environment.

The Importance of a Transparent and Public Work Plan

Joint Commenters support the provision that the initial staff member will be tasked with developing a work plan to prioritize responsibilities and establish a reporting structure. We recommend that work plan be made public and that stakeholders be provided a formal opportunity to offer feedback before the plan is submitted to the Board because this work plan will determine the path to achieving the OPP’s goals. We recommend that the SOW be amended to include explicit language to this effect. Providing public insight into the OPP’s operational priorities will build trust and ensure the office is meeting the needs of the community it serves.

Preserving the Detail of the Pathways Step 2 Final Proposal

While we recognize that the SOW is a high-level document, we are concerned that much of the granular detail and critical public interest protections developed during the “Step 2 Final Proposal” process are not explicitly reflected in the current draft. The recommendations in the Step 2 Final Proposal were the result of extensive stakeholdering and reflect the collaboration of dozens of diverse parties across the West.

It is vital to preserve the intent of that consensus-driven work. Therefore, we strongly encourage the Board and OPP staff to use the OPP Section of the Step 2 Final Proposal as the primary blueprint for the

development of the work plan. Specifically, we urge the inclusion of the following elements in the office's initial priorities:

- Review of Public Interest Incorporation: The OPP should periodically review whether ROWE processes effectively incorporate public interest values and report those findings directly to the Board.
- Neutral Policy Roadmaps: The OPP should focus on producing roadmaps for stakeholder engagement on specific, complex issues to lower the barrier for non-technical participants.
- Proactive Regional Engagement: The OPP's engagement should be proactive and reach across the region, utilizing virtual and in-person meetings to reach potentially impacted stakeholders who may not be traditional market participants.

Finally, the OPP is only *one path* to encourage and facilitate tribal engagement and this should be considered in the staff work plan. Tribes are both sovereign nations and stakeholders, therefore, tribal engagement goes beyond the OPP's scope. We are encouraged that the Pathways Formation Committee has a tribal engagement work stream to develop recommendations on tribal engagement for the initial years of the ROWE.

The Launch Committee stated that this proposal represents the strongest set of public interest protections of any market construct in the country. By ensuring the OPP's work plan is public and rooted in the hard-won consensus of the Step 2 Proposal, ROWE can turn that vision into a reality for all western energy consumers.

Respectfully submitted,

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