



# Provider of Choice Background Sessions: Contract Term/Cost Control *and* Carbon and Environmental Attributes

PPC Rates and Contracts

August 10, 2021

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# Agenda

- Customer feedback from July 13 HWM & Tier 1 System discussion
- Contract Term and Cost Control Background Session
- Carbon and Environmental Attributes Background Session



| Topic           | Summary of Comments from 7/13/21 HWMs/Tier 1 System   | BPA Response   |
|-----------------|---|--|
| CHWMS           | Five of the six comments noted that agreement on what do with CHWMs is needed. One noted that the CHWMs could be maintained for the sake of expediency, if all agree. One wanted recalculation. One had no preference. Two were concerned with winners and losers and wanted further exploration of WPAG’s option 4. One comment was firmly opposed to recalculation. | BPA appreciates the feedback and is open to additional discussion on HWMs later in the Post-2028 PPC schedule.   |
|                 | Two comments noted that regardless of whether CHWMs are recalculated or not, conservation achievements need to be valued. One comment suggested that CHWMs should be recalculated and conservation should not be included unless general consensus can be reached.  |  |
| Tier One System | Four of the six comments suggested something other than critical water planning be used to calculate the Tier One system output. One comment was opposed to changing how the Tier One system is currently calculated.   | BPA acknowledges that there is not complete consensus on the size of the Tier One system, but most customers are interested in expansion and more certainty. |
| Other           | One comment noted that BPA and Customers should focus on developing the higher principle we want the calculation of the CHWMs to be based on, rather than focusing on the different options at this point. This comment also expressed opposition to recalculation of the CHWMs.  | BPA is open to having a higher principle discussion if customers agree it is wanted.   |
|                 | Two comments mentioned that a concept should be developed to reallocate unused CHWMs or create a “Carryover CHWM” concept .   | BPA is open to new concepts on how to value unused CHWMS.  |
|                 | One comment suggested a return to melded rates, but also did provide comments on what to do if tiered rates are maintained.   | BPA appreciates the feedback, but to date BPA has heard broad support for a Post-2028 contract with Tiered Rates.  |





# Contract Term and Cost Control Background session

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# Agenda: contract term and cost control

- Contract term
- Cost control
- Framing of issues for October discussion

# Contract term/cost control & the 6 steps

In today's session we'll reflect what we've been hearing from you on contract term and cost control. We'll review maximum allowable contract term, discuss past terms, status quo and highlight certain considerations. For cost control, BPA will share the cost control mechanisms currently employed in the Regional Dialogue policy and contracts, and we'll frame out the scope of the October discussion, inviting customer feedback and ideas in advance of that session.

Step 1:  
Introduction & Education

Step 2:  
Description of the Issue

Today's  
Session

Step 3:  
Analyze the Issue

Step 4:  
Discuss Alternatives

Oct 26<sup>th</sup>  
Session

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Step 5:  
Discuss Customer Feedback

Step 6:  
Staff Proposal – **Culminating in  
Concept Paper**



# Contract Term

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# Contract term—20 year maximum

## Contract Term

- Section 5(a) of the Bonneville Project Act of 1937 specifies that contracts “. . . shall be effective for such period or period, including renewals or extensions, as may be provided therein, not exceeding in the aggregate twenty years from the respective dates of the making of such contracts.”
- From this it's important to note that the entire term of our power sales agreements are limited to 20 years, but actual power deliveries under those contracts can be for a shorter duration.
- Regional Dialogue contracts were executed in 2008, but power deliveries began October 1, 2011, following expiration of the Subscription contracts, accounting for 17 years of actual power deliveries.



# Excess Federal Power Considerations

- Energy and Water Appropriations Act of 1996 granted BPA new authority to market “excess federal power” (EFP), which is surplus federal power customers have abandoned.
- BPA may sell EFP up to seven years (including outside the region if first offered to Northwest customers), without any recall requirements or prohibition on resale. 16 U.S.C. 832m(b)(1).
- The seven year sale of excess firm power may have bearing on conversations regarding upcoming contract term and cost control conversations and establish one bookend for the minimum term of contract.

# Customer feedback on contract term

- Many customers like the security of a long-term, 20-year power sales contract.
- Some have expressed a preference for shorter-term contracts especially if BPA were to deviate significantly from today's contracts and rate design.
- Customers are concerned about BPA's ability to manage cost pressures and keep rates low over a long term.
- Customers recognize that BPA's very low-carbon FCRPS is becoming increasingly valuable and desirable, and they want to maximize and lock in their allocation of BPA's supply.
- Almost universally, customers expressed a desire for contracts between 10 and 20 years, and many customers expressed interest in a 20-year contract if it were to come with off-ramps.

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# Contract terms and BPA's preference

## Past and present contract terms

- Since BPA began marketing federal power nearly all contracts have been for 20 years.
- Subscription had a 10 year term. (Parties wanted 20 year contracts; however, Washington DC did not support having contracts longer than 10 years. IOUs aggressively lobbied DC for shorter contracts.)
- Regional Dialogue is a 20 year agreement.

## BPA's position on long-term contracts

- BPA prefers a long-term 20-year contract, which is consistent with sound business principles and helps protect its long-term financial stability.
- BPA will continue to advocate for a long-term 20 year contract and looks forward to further brainstorming and discussions about how we can structure and employ cost control mechanisms in the Provider of Choice policy and contracts that will provide customers enough confidence to enter into long-term contracts.

# Contract term considerations

- Customers get long-term power supply predictability and certainty; BPA gets revenue/cost recovery.
  - Operational benefit—both customers and BPA can plan systems accordingly
- Contract and rate design can be flexible enough to weather uncertainties.
- Capital recovery periods for new generation are long; long-term certainty needed to back up financial commitments to new resources.
- BPA has obligations to repay the Federal investment in the Federal power system and to investors who hold BPA-backed third party debt. Long-term take or pay contracts help ensure a revenue stream to cover these obligations.
- There are tradeoffs with long-term certainty versus flexibility; consider mechanisms to recognize this (e.g. rate incentives for longer-term commitments).



# Cost Control

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# Customer feedback on cost control

- Customers want stable, predictable rates, minimal surcharges and cost control.
- Customers acknowledge BPA's efforts in cost control to date and have an expectation that BPA will continue finding ways to control its costs and keep rates competitive.
- Significant customer emphasis given to the foundational interest of “Lowest Tier 1 costs and Tier 1 rates”.



# Customer feedback on cost control

## Tensions

- Some customers shared that they believe infrastructure development will be necessary, constituting a good investment worthy of an associated rate increase, and they are concerned that BPA may defer such maintenance/development costs into the future.
- Tensions and tradeoffs exist when customers prioritize lowest cost rates, affordability and cost control in light of certain programs and service flexibilities.
- We will revisit these tensions and the region's priorities as we discuss not only cost control and contract flexibilities, but also the foundational interests (or principles) conversation on October 26 (scheduled together with the cost control/contract term discussion).



# Defining the cost-control box

- Mechanisms that may be considered in the Provider of Choice policy, contracts and rate methodology (such as TRM). For example:
  - Flexibilities to diversify
  - Caps/limitations on certain products, services and benefits
- Distinct and separate from program costs.
  - Program costs—on all relevant Federal Columbia River Power System capital and expense spending levels—are addressed through BPA's Integrated Program Review (IPR) process





# Cost control – an evergreen topic

- In 2007 Regional Dialogue long-term policy, BPA committed to establish a regional FCRPS strategy and cost review public process and committed to:  
“ensuring regular access to clear and transparent financial information and frequent opportunities for meaningful input into BPA cost and program decisions.”
- The IPR process in 2004/2005 didn’t look like IPR now. BPA now affords far more transparency and access to an increasing level of detail so customers understand its finances.
- BPA has been accountable on cost control and transparency – and does not see that accountability wavering.

## RD Concept Paper: BPA Cost Control Process Goals

- Assure effective control of BPA’s spending, consistent with accomplishment of BPA’s mission, both expense and capital;
- Respond to customers and/or constituent concerns regarding BPA cost decisions;
- Provide reasonable assurance that 20-year contracts will remain attractive through effective cost management;
- Stay within existing law;
- Build trust and confidence through BPA’s management of its costs;
- Avoid creating excessive administrative costs;
- Support customers’ understanding of BPA’s processes, decision-making, and performance; and
- Recognize that this is a Federal system in which Federal officials must ultimately be accountable for decisions.

# Cost control – a central concern



- Cost control is central to BPA’s strategy – and is a shared priority across the agency.
- BPA exercises cost control, or cost management, as reflected in business/policy decisions that, in turn, reflect congressional direction to encourage widespread use of federal power at the lowest possible rates to consumers consistent with sound business principles.
- Cost control versus cost management—BPA strives to intelligently manage our budgets. We cannot necessarily control all costs, but we can manage our costs to the best of our ability, again, consistent with sound business principles.



# Framing the discussion in October

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# Looking ahead

- In the October 26 session, BPA looks forward to discussing cost control mechanisms customers are interested in. *And* the trade-offs.
- Mechanisms that give customers the flexibility to diversify
  - Mutually beneficial options whereby customers are afforded flexibilities, for instance around their elections, or when real infrastructure, generating resources are getting built
  - Off-ramp options which can be structured with mutual benefits, flexibilities, protections against risk; perhaps associated with laws or rate ceilings, or allowable for fractions of loads.
- Discuss sharing risk and long-term debt/stability.
- Some costs have degrees of discretion *and* deliver direct customer benefits (think IRD, transfer). Sensitive topics with inherent trade-offs.
- BPA is open to outside-the-box thinking and would like to hear ideas customers have.

# Additional resources

- Your Power AEs!
- Regional Dialogue [Concept Paper](#) and [Policy](#)—good resources for understanding what cost control principles were considered and ultimately employed under Regional Dialogue.
- BPA's [Finance Public Processes](#) website, including Integrated Program Review information, discussing program cost issues that are outside of the scope of these Provider of Choice discussions.
- This 2020 [Rate Setting 101](#) fact sheet gives a breakdown of how BPA spends a dollar of its power revenue.





# Carbon and Environmental Attributes Background

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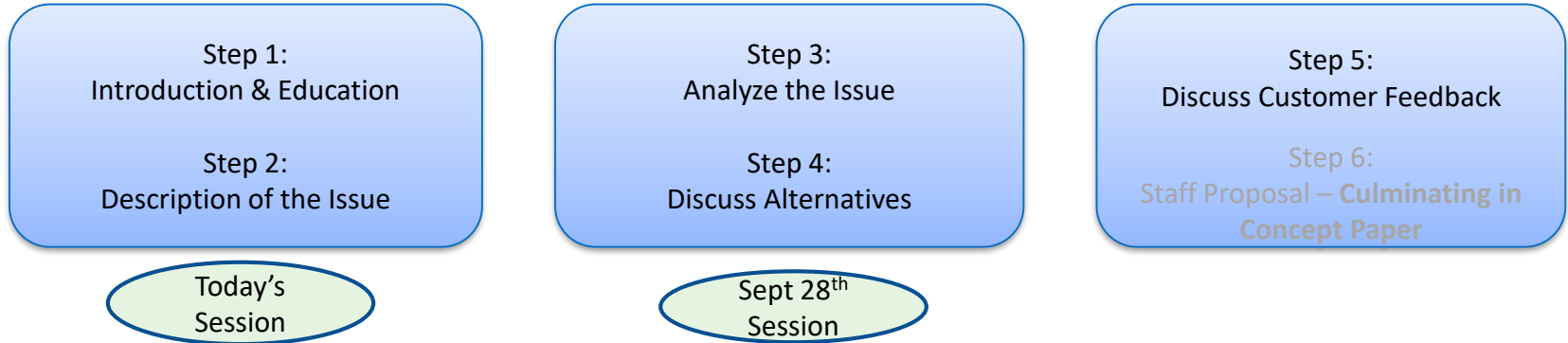


# Agenda for carbon/enviro. attributes

- Customers' feedback
- Past and present BPA contract approaches
- Relevant state policies
- BPA's system sales, legal basis
- Framing September's carbon discussion

# The carbon discussion & the 6 steps

In today's session we'll reflect what we've been hearing from you on carbon-related issues. We'll review how our past and present contracts have responded to evolving concepts of environmental valuation, including renewable energy certificates (RECs). We will outline the current regulatory environment in the region related to carbon regulation. Lastly, we'll discuss BPA's system sales and the legal reasons behind it, which will undoubtedly have a bearing on the overall carbon conversation, and foreshadow what we plan to explore in the late September PPC carbon/environmental attributes discussion.



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# Disclaimer/Acknowledgement

- Regulatory landscape across states and nationally remains extremely dynamic. Valuing and regulating power generation from a carbon and environmental perspective is complex and will continue to evolve.
- Terms are evolving; different under Regional Dialogue than today and different still in 2028.
- Inconsistent, and sometimes conflicting, state programs; terms and expectations vary (for instance REC in WA is different than definition of REC in CA).
- BPA's goal in this meeting is to create a safe space to brainstorm; we want to avoid getting wrapped up in terminology, but rather, keep the discussion conceptual.
- BPA is not advocating any position. Language used in the slide deck is intended for discussion purposes and we want to hear from you.



# Customer Feedback to Date



# Reflecting what we've heard from you

## Customer comment category 1: Meeting carbon mandates is critical—want nearly/carbon free products

- Interest in exploring carbon-free or nearly carbon-free products; perhaps subject to a Tier 2 rate.
- Ideally products/policies will help customers with state compliance; at minimum can't be an impediment
- Differentiate carbon-free product(s) by price.
- Many customers noted concerns around their ability to add and remove new carbon-free non-federal resources when necessary to comply with state requirements.
- WA customers: Contract timing should consider CETA timelines.

Open for discussion in the Non-Fed Resource forum!

## Customer comment category 2: Environmental Attributes

- With 'one-system sale' reality, customers may possibly be able to 'green' BPA products up with RECs.
- Customers throughout the region want BPA to continue the current practice of pro-rata distribution of environmental attributes.

# Reflecting what we've heard from you

## Customer comment category 3: Concerns

- With increased demand and the potential for FCRPS and Tier 1 system capability declines, customers are concerned about the dilution of the existing clean/green benefits of the FCRPS:
  - BPA's entrance into the EIM?
  - BPA's potential need to augment the system to meet energy or capacity shortfalls?
  - Continued operational constraints?
- How can BPA maximize the size and value of the clean FCRPS? Tradeoffs of doing so?
- Customers in states *without* carbon regulations are concerned about the implications on price of power.
  - Related to price, will associated premiums be cost prohibitive?
- Some concern expressed that the Residential Exchange Program (REP) will only get larger with carbon legislation and retirement of thermal resources.



# Treatment of Environmental Attributes Under Existing and Prior Contracts

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# EPP product under Subscription

## Environmentally Preferred Power or EPP

- In the mid-90's BPA developed EPP to market to customers with consumers interested in getting “green.” No specific environmental attributes conveyed. Certain resources were certified as “green” by several environmental groups. BPA deemed the EPP came from those resources.
- A customer could designate any portion (up to 100%) of their Subscription purchase as EPP. However, the amount of EPP customers could designate was limited by the availability of EPP resources.
- Customers were charged a ‘Green Energy Premium’ (GEP) appropriate to their specific EPP.



BPA POWER PRODUCTS CATALOG

| <i>Customized Product</i>                  | <b>Environmentally Preferred Power</b>   |
|--|--|
| <b>Environmentally Preferred Resources</b> | <p>Environmentally Preferred Resources may be made available from a variety of resources including:</p> <ul style="list-style-type: none"> <li>• Endorsed Hydropower facilities</li> <li>• New or existing solar, wind, geothermal or biomass generating facilities</li> </ul> <p>Availability of specific resources is subject to change.</p> |
| <b>Term</b>                                | Environmentally Preferred Power resources are available for terms of 1-5 years, beginning October 1, 2001 (if available).  |
| <b>Scheduling</b>                          | EPP is not a scheduled power product.  |
| <b>Transmission</b>                        | Transmission and ancillary services are not included as part of EPP.   |
| <b>Disclosure</b>                          | BPA will provide the purchaser with periodic reports documenting the project source and power delivery schedules associated with this sale.  |
| <b>Payment</b>                             | Take-or-Pay: Payment is based on monthly contract amounts.   |

Source: [1999 BPA Power Products Catalog](#)

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Pre-decisional. For discussion purposes only.



# From EPP to providing RECs under RD

- In the RD policy, BPA contemplated continuing its policy of marketing RECs (whether independently or in conjunction with EPP) and collecting Green Energy Premiums.
- However, in the 2008 RD [Contract Policy ROD](#), BPA decided to provide RECs associated with specified Tier 1 renewable resources to BPA's preference customers signing CHWM Contracts.
- BPA provides the RECs annually on a pro-rata basis based on RHWMs, bundled with power purchases, at no additional charge.
- Some customers had a contractual right to continue purchasing EPP into the RD contract term. When those rights to EPP expired in 2016, BPA no longer collected a green energy premium for RECs under Regional Dialogue.



# Tier 2 RECs, Carbon Attributes, REP

## Under Regional Dialogue:

- RECs associated with resources in the Tier 2 cost pool are proportionally transferred to those applicable Tier 2 customers. (BPA also committed, through its vintage rate offering, to facilitate renewable Tier 2 resource acquisition.)
- At the time RD contracts were developed, RECs were a compliance tool for meeting state Renewable Portfolio Standards. Carbon credits were a separate, emerging concept.
- Under RD contracts any future value of carbon credits associated with resources subject to Tier 1 or Tier 2 rates would be conveyed to preference customers within the cost pool as: (1) the carbon credits themselves; (2) a revenue credit after BPA markets carbon credits; or (3) the ability to claim that power purchases, at the applicable PF rate, are derived from certain federal resources.
- BPA reserved its right to terminate customers' RD contractual rights to RECs or carbon *if* BPA needed them for compliance purposes.
- The 2012 REP settlement carved out a negotiated share of the value of environmental attributes for the IOUs.

# During RD contract negotiations

- RECs and carbon credits were relatively new market and regulatory concepts. They are not a statutorily defined component of Federal power service and are not electric power.
- PPC proposed that preference customers should not pay any additional premium for those attributes because, they suggested, the costs of those attributes are already included in the costs of the resources that are accounted for in rates.
- Since then, the state clean energy regulatory environment has been actively evolving...



# State Landscape on Carbon Reduction and Clean Energy Regulatory Environment in the Pacific NW

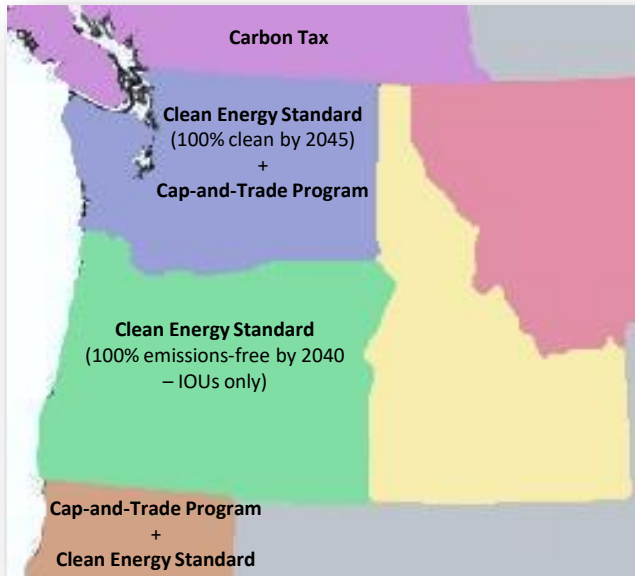
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# Regulatory trends

- In the last several years, states have moved from RPS towards policies and programs that reduce greenhouse gas emissions through direct carbon reduction programs and/or aggressive clean energy standards.



- In the region, Washington passed both a clean energy standard in 2019 (CETA) and a cap-and-trade program in 2021. Oregon passed a clean energy standard (IOUs only) in 2021.
- BPA has 65 customers in Washington (or ~48% of total customers) representing about 61% of preference sales.
- This is an evolving area. These policies are likely to continue to develop and evolve in the coming years, perhaps long after post-2028 contracts are executed.

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# Washington: CETA

- **By January 2026**, Washington utilities must eliminate coal in retail rates.
  - Unspecified power contracts longer than one month need to demonstrate that they are not sourced from coal.
- **By January 2030**, Washington utilities must be 100% carbon neutral.
  - 80% must be from renewable and non-emitting resources. RECs must be tracked and retired. Likely the entire federal hydro system produces RECs by 2030.
  - 20% can be from fossil fuels but must be mitigated for by purchasing unbundled RECs (no double counting), doing an Energy Transformation Project, or paying an administrative fee.
  - Cost cap: a utility is deemed in compliance if they spend 2% of revenues annually to comply.
- **By January 2045**, Washington utilities must be 100% carbon free.
  - There is currently no penalty for non-compliance, but the intent is that resource plans should be driving towards this goal.

# Washington: CETA

- Key unresolved issues that BPA is watching:
  - Interpretation of “use.” How will Washington utilities demonstrate compliance with the law and how do power purchases from BPA fit into that demonstration?
  - What constitutes “double counting” of environmental attributes?
  - Are there any solutions for documenting “no coal” for unspecified contracts longer than a month?

# California Cap-and-Trade

- California's cap-and-trade program has been in place since 2013. It covers both in-state generation and electricity imported into the state.
- BPA is the covered entity (the "first jurisdictional deliverer" or FJD) for sales into California for both firm power requirements service and sales of surplus.
- California considers BPA as an "Asset Controlling Supplier" or ACS, which recognizes that BPA sells from a low carbon single system of resources and assigns an emissions factor to sales of power from BPA's system into the state.
- As an ACS BPA generally receives a premium for sales of surplus power into California.
- In determining the emissions factor for a resource, CARB only looks at the fuel type, without regard to disposition of RECs unless it is an eligible resource under California's RPS (large hydro is not eligible).

# Washington Cap-and-Trade

- The Washington legislature passed a cap-and-trade program during the 2021 legislative session. The program is set to begin in January 2023, and will cover in-state generation and electricity imported into the state.
- Like California, the law recognizes that BPA sells from a single system of resources and thus creates an ACS designation as a type of specified resource.
- Rulemaking is just getting started...
  - TBD: whether RECs need to be retired in order for a resource to qualify as zero emissions under the program.
- At this time, BPA has not decided whether it will be the covered entity (the “FJD”) under the program for federal sales into the state, or whether that obligation will fall to BPA’s customers.



# Oregon – Clean Energy Standard

- The Oregon legislature passed a clean energy standard in June 2021.
- Directs the two largest state IOUs and Energy Service Suppliers to reduce GHG emissions by 80% by 2030, 90% by 2035, and 100% by 2040.
- Consumer-Owned Utilities are not covered under the program.
- An ACS emissions factor applies to BPA sales to IOUs (unless the sale is unspecified).



# BPA System Sales

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# BPA system sales

## What is a system sale and why does it matter in this context?

- A system sale is a “sale to a customer, usually wholesale, from the seller’s system as a whole, without identifying a specific resource as being the creator of the power being sold.” See BPA Dictionary.
- Firm Power Requirements power is supplied from the Federal Base System (which consists of dams, CGS, and non-federal resources that BPA acquires) as a pooled system. BPA uses the entirety of this system to meet its contractual power supply obligations subject to PF rates.

# Legal basis for system sales

## Legal basis for BPA's system sales comes from a combination of:

1. Directives to integrate and operate the Federal system as a single, **coordinated system**. (Executive Orders, Legislative History)
2. Directives to sell output of the **Federal Base System Resources** to meet BPA's total power obligations. (NWPA § 3(10)).
3. Directives to recover "**total system costs**" of the Federal system. (NWPA § 7(a)(2)(B)).

# System sales: coordinated system

## Directives to operate as a coordinated system

- Executive Order No. 8526 issued in 1940. Directed BPA to market power from Grand Coulee, in addition to Bonneville.
- Senate Committee hearings on H.R. 3961 (Flood Control Act of 1944), Secretary of Interior stated:

“Physical integration of the power facilities at these new projects with the existing facilities of the Bonneville Power Administration will be needed for most efficient and economical marketing of energy . . . .”

# System sales: coordinated system

## Directives to operate as a coordinated system

- Legislative history of the Third Powerhouse Act for Grand Coulee Dam (1966) described at length the interconnected nature of FCRPS:
  - “These numerous power plants, linked together as they are both by transmission lines and by, in most cases, a common source of water supply are and **must be operated as a unit, not as if they were separate and competing enterprises** . . . The other side is equally clear. Just as the transmission grid draws on numerous Federal power installations for its supply of energy, so it delivers to numerous customers throughout its service area.”
  - “[Customers] A, B, and C all draw energy, directly or by displacement, from [generator] X, Y, and Z and . . . the amount which they draw from each of these sources varies from season to season, from day to day, and even from hour to hour.”

# System sales: coordinated system

## The same is true today:

- Federal dams are operated as a unit, not as if they were a separate, competing enterprise.
- BPA does not allocate power from any federal dam.
- BPA's customers, throughout BPA's service territory, all draw energy from numerous federal projects, as well as from Columbia Generating Station and from market purchases BPA has made.
- The amount which they draw from each of these sources varies from season to season, from day to day, and from hour to hour.

# System sales: the Federal Base System (FBS)

## Federal Base System Resources

- “Federal base system resources” defined in statute: dams, nuclear plants, and resources acquired to replace reduction in capability of the first two. NWPA § 3(10).
- This includes all of BPA’s system. Statute speaks in plural: “resources”
- The last provision regarding “resources acquired” is noteworthy—it is what makes the power acquired from the market a part of BPA’s pooled system of resources.



# System sales: rate directives

## Rate directives: “total system costs”

- The Northwest Power Act directs the Administrator to establish rates “based upon the Administrator’s **total system costs**” and the rates for preference customers are to “recover the costs of that portion of the Federal base system resources needed to supply such loads . . . .” § 7(a)(2)(B), 7(b)(1).
- This aligns with the system sale paradigm by directing BPA to set rates to recover the costs of the entire federal base system, which presumes that BPA is using the entire federal base system to serve its customers’ loads.

# System sales: rate directives

- Indeed, BPA must stand ready with the entirety of the FBS to meet its customers' needs. NWPA § 5(b)(1) says that “whenever requested” Bonneville shall offer to sell power to meet customers' firm power load.
- In short, BPA's customers receive varying amounts of power supplied by the Federal base system resources, and benefit from the diversity and coordinated operation of these resources, and therefore are responsible for the melded “total system costs.”

# System sales—on the other hand...

- Conversely, if the whole system were not being used to supply BPA's customers, then customers could potentially raise challenges to BPA's ability to allocate costs of nuclear projects, fish and wildlife, conservation and other costs not directly related to the generating costs of a specific project.
  - That situation would create conflict among BPA's customers as to which customers are responsible for which costs of which projects at which time.
- Any sale from a specific resource or exclusion of particular resources from a system sale would be inconsistent with the above statutory foundations and would put specific limitations on how the system is operated. This would infringe on BPA's flexibility and ultimately reduce the overall output of the system.



# The realm of the possible: Framing the discussion in September

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# Looking ahead to the discussion

At the planned September 28<sup>th</sup> PPC meeting\*, BPA is planning to address the following questions/concepts BPA has received from utilities:

1. How should RECs be allocated?
2. And how to address carbon content in our products?

BPA will share some of the brainstorming it is doing, at the conceptual level, around these two questions.

BPA is eager to hear customers' proposal and offers to share time during the September 28<sup>th</sup> session so we can all benefit from what ideas or principles other customers have.

\*Sept. 28 is currently reserved for the carbon discussion; subject to change.

# Key considerations

Here are some of the key considerations BPA is overlaying our analysis of brainstormed REC and carbon product alternatives:

- How would this work with BPA's "single system mix"?
- What kind of flexibility does the alternative offer in terms of being able to meet state and national policies that are likely continue to develop in the coming years?
- How will the alternative impact Washington customers' ability to meet CETA mandates?
- How would this impact other customers' respective state policies?
- Will this shift costs to other customers? Is there cost causation?
- What would the impacts be for surplus sales?

[Are we missing a key consideration?](#)

# REC & carbon options for discussion

- REC allocation ideas
  - What other REC and/or carbon allocation methods might work, *aside from what we are currently doing?*
- Carbon product ideas
  - What can be done to decrease the carbon emissions and increase the clean energy in the system? This includes both steps BPA could potentially take in purchasing and accounting practices and also how regional energy markets and state accounting practices may evolve.
  - What product and rate design methods may meet customer needs while still honoring the requirement for system sales? Can we design multiple products and rates that serve different customer objectives?
- Are there other ways BPA should be looking at this? BPA welcomes customers to also present ideas at the September forum.

# Additional resources

- Your Power AEs! They are a wealth of knowledge and have a toolbox of educational PowerPoint presentations on a variety of topics including RD contracts, policy, products and services.
- Provider of Choice 2020 [carbon fact sheet](#).
- Regional Dialogue [Concept Paper](#) and [Policy](#)—good resources for understanding how the conversation/elements evolved and they provide bite-size explanations of the building blocks.
- Public Power Carbon Forum materials. Contact Aaron Bush at PPC for more information. [abush@ppcpdx.org](mailto:abush@ppcpdx.org) / (510) 332-8901





# The next sessions...

## Provide feedback by August 24:

- [post2028@bpa.gov](mailto:post2028@bpa.gov)  
(copy your Power AE)
- Power AEs
- Trade Orgs, as applicable

|                     |   |
|---------------------|---|
| May 27: 10am-noon   | HWM & Tier 1 System Background                          |
| June 8: 1-3pm       | Non-Federal Resources Background                        |
| June 22: 1-3pm      | BPA's Statutes, Capacity & Resource Adequacy Background |
| July 13: 1-3pm      | HWM & Tier 1 System Discussion                          |
| July 27: 1-3pm      | Non-Federal Resources Discussion                        |
| August 10: 1-3pm    | Carbon Background, Term/Cost Control Background         |
| August 24: 1-3pm    | <b>Capacity &amp; Resource Adequacy Discussion</b>      |
| September 14: 1-3pm | Transfer & Transmission Background, EE Background       |
| September 28: 1-3pm | Carbon Discussion                                       |
| October 12: 1-3pm   | Transfer & Transmission Discussion                      |
| October 26: 1-3pm   | Term/Cost Control Discussion and revisit Interests      |
| November 9: 1-3pm   | EE Discussion   |
| Mid-November: 1-3pm | REP Background  |
| December 14: 1-3pm  |   |

Thank you for your time today and your ongoing engagement in post-2028 conversations.

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