

## FY 2026 CHWM Calculation Draft CHWM Comment Close-out

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The Bonneville Power Administration (BPA) began the Fiscal Year (FY) 2026 Contract High Water Mark (CHWM) Calculation Process by posting draft CHWMs for review and comment on March 10, 2026. BPA held a public meeting on March 11, 2026 to discuss the draft CHWMs and answer questions raised at that time. Customers and interested parties had through April 6, 2026 to submit reasonable requests for information regarding the inputs and calculations and provide comments on the draft CHWMs.

BPA received two comments,<sup>1</sup> one from Public Utility District No. 2 of Grant County, Washington (Grant) and one from Public Utility District No. 1 of Snohomish County (Snohomish). BPA also identified a ministerial error on the 3/10/2026 Draft CHWM Model, Info tab, Attachment A description. BPA has updated the description to reflect that Attachment A values are from the final CHWM Implementation Policy (CHWM Policy). This edit did not result in any change to CHWMs. BPA responds to the two commenting parties below.

### Snohomish

Snohomish commented that it “appreciate[d] BPA’s efforts to engage with us and other customers throughout this rigorous process. We commend BPA staff for their hard work and dedication in developing this foundational element of the Provider of Choice contracts.” CHWM-2-Snohomish at 1. Snohomish agreed with BPA’s CHWM calculations. *Id.*

BPA thanks Snohomish for confirming that its CHWM is calculated as expected.

### Grant

Grant provided multiple requests, which BPA responds to as follows:

#### Issue: Grant Request #1

Grant requested that “BPA identify all changes, including changes BPA may consider ‘non-substantive,’ formatting-related, or ‘clarifications,’ that affect any value used in the CHWM calculation” between the January 26, 2026 CHWM Calculation Model<sup>2</sup> and draft CHWMs posted on March 10, 2026.<sup>3</sup> CHWM-1-Grant at 1.

BPA created several versions of its CHWM Calculation Model to serve as informational tools to help inform policy development. BPA provided updates to the model as better or new information became available. The January 26, 2026 model, and all versions of the model prior

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<sup>1</sup> Comments on draft CHWMs are available at <https://publiccomments.bpa.gov/Category/CategoryDetails?CategoryId=547>.

<sup>2</sup> The January 26, 2026 CHWM Calculation Model is available at <https://www.bpa.gov/-/media/Aep/power/provider-of-choice/CHWM/poc-fy-2026-chwm-calculation-model-01262026.xlsx>.

<sup>3</sup> Draft CHWMs are available at <https://www.bpa.gov/-/media/Aep/power/provider-of-choice/Implementation/2026-draft-chwm-calculation.xlsx>.

to the publication of draft CHWMs in the March 10, 2026 version, were marked with a disclaimer that stated the models were for illustrative purposes only and data was not final. The January 26, 2026 model was provided as an informational model due to a number of changes from the October 2025 model that are described on the Info Tab, cells C5-E5.

Only the March 10, 2026 model is considered a source of record for the formal calculation of customers' CHWMs in the FY 2026 CHWM Calculation Process. None of the models prior to the draft CHWMs are considered as a source of record for the formal CHWM calculation.

The only data change between the January 26, 2026 model and the draft CHWMs provided in the March 10, 2026 model were the economic adjustment amounts. Draft economic adjustment amounts were populated in the January model and finalized by the publication of draft CHWMs. The draft economic adjustment amounts are on the Calculation Tab, cells D14, D54, and D111 in the March 10, 2026 model.

BPA made a number of non-substantive changes on the Info Tab between the two models to reflect that the March 10, 2026 model is considered draft and includes confirmed data. For example, BPA removed the disclaimer that the calculation model was for informational purposes only. BPA has provided a word compare version of the Info Tab in a document titled "CHWM Model Info Tab Redline."<sup>4</sup>

Formatting changes have no impact on the calculation of CHWMs; as such BPA declines to identify every formatting change that was made between the January 26, 2026 and March 10, 2026 models. Grant has had both models since their publication and can perform a comparison of formatting changes.

### Issue: Grant Request 1A

Grant requested that BPA "identify all changes, including changes BPA may consider 'non-substantive,' formatting-related, or 'clarifications,' that affect any value, input, assumption, or methodology used to calculate Grant's CHWMs," including changes among the POC Policy draft, POC Policy final, and POC Policy ROD. CHWM-1-Grant at 1. BPA has provided a spreadsheet responding to this request titled "CHWM-Closeout-Response-1A."<sup>5</sup>

CHWM-Closeout-Response-1A does not identify formatting changes. Formatting changes have no impact on the calculation of CHWMs; as such BPA declines to identify every formatting change that was made between the January 26, 2026 and March 10, 2026 models. Grant has had both models since their publication and can perform a comparison of formatting changes.

### Issue: Grant Request 2

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<sup>4</sup> The document "CHWM Model Info Tab Redline" will be made available at <https://www.bpa.gov/energy-and-services/power/provider-of-choice/implementation>.

<sup>5</sup> The spreadsheet "CHWM-Closeout-Response-1A" will be made available at <https://www.bpa.gov/energy-and-services/power/provider-of-choice/implementation>.

Grant requested BPA “provide the source documents and page-specific citations” supporting the following inputs to the CHWM calculation. CHWM-1-Grant at 2.

- March 10, 2026, CHWM Model, Calculation Tab, cell C69. This is Grant’s weather normalized total retail load. This came from cell H6 of the Calcs Tab from the spreadsheet titled “POC WN – 10190 – Grant PUD.”<sup>6</sup> Each customer with a Provider of Choice contract has their own spreadsheet that was created by BPA’s load forecasting group as part of the weather normalization process.
- March 10, 2026, CHWM Model, Calculation Tab, cell E69. This is Grant’s New Large Single Loads (NLSL) actual load data in FY 2023. This came from cell H12 of the spreadsheet titled “Grant FY 23 – NLSL and PF Eligible Loads.” BPA can make the data publicly available upon Grant’s request, however it is BPA’s understanding this data may contain information that Grant considers proprietary. Therefore, unless Grant provides confirmation that it wishes to make this data public, BPA will not provide it at this time.
- March 10, 2026, CHWM Model, Calculation Tab, cell F69. This is Grant’s Existing and Other Non-Federal Resources. Calculation Tab, cell F69 is the aggregate of amounts listed in Attachment A Tab, cells E81-85.
- March 10, 2026, CHWM Model, Conservation Data Tab, cells C65-H65. These are the aggregate of self-funded conservation achievements approved by Bonneville that meets the eligibility and reporting requirements of the Bonneville Energy Efficiency Implementation Manual as incorporated by the Energy Conservation Agreement and applied to the CHWM calculation consistent with Section 2.4.1.5 of the Provider of Choice Policy, published March 21, 2024<sup>7</sup> (POC Policy). BPA maintains reporting of all measures submitted to BPA in the Bonneville Energy Efficiency Tracking System (BEETS). BPA has provided those measures in spreadsheet “BPA Activity Report – Grant through FY23.”<sup>8</sup> Based on reporting, there is one commercial non-residential lighting measure (Project Tab, row 19) that qualified as a self-funded measure (Project Tab, column W).
- March 10, 2026, CHWM Model, Attachment A Tab, cells E81-85. These are data points from the CHWM Implementation Policy Attachment A at page 20.

### Issue: Grant Request 3

Grant requested BPA “[p]rovide BPA’s calculation of Grant’s dedicated Priest Rapids Project (PRP) amounts (aMW).” CHWM-1-Grant at 2. BPA notes that Grant’s use of the term “dedicated” invokes a concept that is separate from Grant’s CHWM calculation. BPA described how it determined Grant’s PRP amounts that would be used in the CHWM Calculation Process

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<sup>6</sup> The spreadsheet “POC WN – 10190 – Grant PUD” will be made available at <https://www.bpa.gov/energy-and-services/power/provider-of-choice/implementation>.

<sup>7</sup> The POC Policy is available at <https://www.bpa.gov/-/media/Aep/power/provider-of-choice/provider-of-choice-policy-march-2024.pdf>.

<sup>8</sup> The report “BPA Activity Report – Grant through FY23” will be made available at <https://www.bpa.gov/energy-and-services/power/provider-of-choice/implementation>.

in Issue 13 of the Contract High Water Mark Implementation Policy Record of Decision, published August 14, 2025 (CHWM ROD).<sup>9</sup> Grant’s request seeks information regarding BPA’s determinations of the PRP amounts included in Attachment A of the CHWM Policy. The CHWM Policy was finalized August 14, 2025, and BPA input the Attachment A values into the FY 2026 CHWM Calculation. BPA is not revisiting CHWM Policy determinations, and such determinations are currently being challenged in the United States Court of Appeals for the Ninth Circuit (Ninth Circuit). BPA does not comment on active litigation.

#### Issue: Grant Request 4

Grant requested BPA “[c]larify whether BPA used PRP values reflecting post-2011 recall rights.” CHWM-1-Grant at 3. BPA described the values used and how recalled rights were applied in Issue 13 of the CHWM ROD in “Section IV. Statutory and policy treatment of recalled PRP amounts” on pages 32-35. Grant’s request seeks information regarding BPA’s determinations of the PRP amounts included in Attachment A of the CHWM Policy. The CHWM Policy was finalized August 14, 2025, and BPA input the Attachment A values into the FY 2026 CHWM Calculation. BPA is not revisiting CHWM Policy determinations, and such determinations are currently being challenged in the Ninth Circuit. BPA does not comment on active litigation.

#### Issue: Grant Request 5

Grant requested BPA “[c]larify BPA’s assumptions about PRP dedication to General Service and NLSLs” and provide documentation. CHWM-1-Grant at 3. First, Grant asked “[w]hether BPA assumed or documented that any specific amount of PRP energy (aMW) was dedicated to Grant’s General Service loads . . . .” *Id.* Yes, BPA reviewed historical load and resource data during its consideration of how to determine PRP amounts for Provider of Choice for both Exhibit A and the CHWM Policy Attachment A. However, BPA did not rely on or use such historic load data as the basis for the CHWM Policy Attachment A determinations. See Issue 13 of the CHWM Policy ROD for BPA’s explanation of how it made its determination.

Second, Grant asked “[w]hether BPA reviewed Grant’s actual NLSL load data in PNCA Operating Year 2008-09.” *Id.* Yes, in January 2025, Grant provided load data from 2005-2025 for its Rate Schedule 15 loads. Grant provided additional load data for its other rate schedules in several iterations between February and April 2025. BPA requested the data as part of its determination of Grant’s net requirements of loads eligible to be served with power purchased at a priority firm rate. BPA requested Grant provide data extending back into the Subscription contract period to ensure that it correctly identified all loads that should be NLSLs. BPA can make the data Grant provided publicly available upon Grant’s request, however it is BPA’s understanding this data may contain information that Grant considers proprietary. Therefore,

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<sup>9</sup> The CHWM ROD is available at <https://www.bpa.gov/-/media/Aep/about/publications/records-of-decision/2025-rod/rod-20250814-contract-high-water-mark-implementation-policy.pdf>.

unless Grant provides confirmation that it wishes to make this data public, BPA will not provide it at this time.

Finally, Grant asked “[w]hether BPA determined that (a) General Service loads grew sufficiently to justify the assumed increase in PRP dedication during the 2000s, or (b) the additional PRP must have been dedicated to NLSLs instead . . . .” *Id.* BPA did not adopt this approach in the final CHWM Policy. See Issue 13 of the CHWM Policy ROD for BPA’s explanation of how it made its determination of Attachment A amounts.

#### Issue: Grant Request 6

Grant requested BPA “[p]rovide page-specific citations for all new documents added in the corrected ROD.” CHWM-1-Grant at 3. The CHWM ROD provided citations with page references for documents added to the ROD. The CHWM ROD speaks for itself in how cited documents are used. The Administrative Record is related to the challenge of the CHWM Policy and ROD in the Ninth Circuit; BPA does not comment on active litigation.

#### Issue: Grant Request 7

Grant requested BPA “[c]larify BPA’s use of the July 30, 2025 email from Grant included in the corrected ROD.” CHWM-1-Grant at 4. This document is included in the Administrative Record related to the challenge of the CHWM Policy and ROD in the Ninth Circuit; BPA does not comment on active litigation.

#### Issue: Grant Request 8

Grant requested “that BPA include in the Administrative Record the PRP dedication values and Attachment A calculations BPA provided in bilateral discussions with Grant at any time during the development of CHWM values.” CHWM-1-Grant at 4. Specifically, Grant requested materials “BPA provided Grant with the agency’s internal PRP dedication values and Attachment A calculations, including the spreadsheet and accompanying email transmitted by BPA staff on March 13, 2025, in follow-up to another bilateral meeting on January 11, 2025.” *Id.* The March 13 email and its attachment (which includes all documents that Grant has referred to in this request) are already included in the Administrative Record. The Administrative Record is related to ongoing litigation and BPA does not comment on active litigation.

## List of Comments

CHWM Policy Assigned ROD Comment Reference	Bonneville Public Involvement Assigned Comment Number	Affiliation	Commenter
CHWM-1-Grant	260001	Public Utility District No. 2 of Grant County	John Mertlich
CHWM-2-Snohomish	260011	Public Utility District No. 1 of Snohomish County	Garrison Marr