WESTERN PUBLIC AGENCIES GROUP INTERIM PUBLIC FEEDBACK

Revised Policy on Determining Net Requirements of Pacific Northwest Utility Customers under Sections 5(b)(1) and 9(c) of the Northwest Power Act

Date Submitted: October 21, 2026

***

WPAG recommends that BPA's process for revising its 5(b)/9(c) policy focus on those revisions necessary to align with the Provider of Choice (PoC) contracts and Public Rate Design Methodology (PRDM). BPA has multiple other major policy initiatives currently underway (including the BP-27 rate case, TC-27 tariff case, GAT, post-2028 REP, financial policy refresh, upcoming and monumental IPR and BP-29 rate proceedings, and BPA's day-ahead market decision to name a few), and time and bandwidth are limited for both BPA and its customers. Expanding the scope of the 5(b)/9(c) policy process to include issues not needed to implement the PoC contracts and PRDM will be contentious and time consuming, and unlikely to yield any appreciable benefit for any party given that CHWMs and above-CHWM service elections are locked in through 2044. At this time, the region has enough on its plate that it should not take up matters today, like extraneous but still very thorny 5(b)/9(c) questions, that will not be ripe again until BPA is ready to begin development of the post-PoC contracts in approximately 2040.