



Department of Energy
Bonneville Power Administration
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In reply refer to: PSRF-6

August 18, 2025

To Regional Parties Participating in the Post-2028 Residential Exchange Program Public Process:

Subject: Response to Regional Parties' Comments on the Post-2028 Residential Exchange Program (REP) Process Timelines for the Residential Purchase and Sale Agreements (RPSA) and Average System Costs Methodology (ASCM) Initiatives.

The Bonneville Power Administration (BPA) has received comments from regional parties that attended the July 28, 2025, Clarification Workshop wherein BPA proposed two options for the RPSA and ASCM process timelines. In this letter, BPA will convey the general message from parties and affirm the public process schedules for RPSA and ASCM.

Background

Section 5(c) of the Northwest Power Act establishes the REP, which gives residential and farm consumers of regional utilities, primarily investor-owned utilities, access to the economic benefits of the low-cost federal hydropower system. The REP is currently administered pursuant to the 2012 REP Settlement agreement that expires September 30, 2028.

In July 2022, BPA outlined in the Provider of Choice Concept Paper a two-phase, Phase 1 and 2, approach to the post-2028 REP implementation. Phase 1 focused on creating space to develop a new settlement of the REP between IOUs and Public Power representatives. Phase 1 was scheduled to run from September 2022 through September 2025. If a settlement was not achieved during this period BPA would pivot to Phase 2, called the "Traditional REP Phase." This phase would shift focus from facilitating settlement dialogue to commencing the processes necessary to implement the REP in a non-settlement context for the post-2028 period.

On July 17, 2025, BPA published its Post-2028 REP Comprehensive Plan Paper that served as the notice to the region that BPA was pivoting efforts to Phase 2. The REP Paper described three foundational processes BPA will lead over the next two years to prep BPA and regional partners to implement REP in the post-2028 period, along with their respective public engagement timelines. The key initiatives outlined in the paper are:

1. Residential Purchase and Sale Agreements (RPSA) process
2. Average System Cost Methodology (ASCM) consultation
3. Section 7(b)(2) Legal Interpretation and Implementation Methodology proceeding

The REP Paper informed BPA’s plan to launch both the RPSA and ASCM processes the Fall of 2025 and offered two timeline options. Option 1 runs from September 2025 through April 2026 and slightly staggers both processes but runs them concurrently. Alternatively, Option 2 segregates the RPSA and ASCM processes; accelerates the RPSA to run from September through December 2025, and the ASCM to run from January through June 2026.

BPA held a Clarification Workshop on the Post-2028 REP Comprehensive Plan Paper on July 28, 2025. At that workshop, BPA encouraged participants to present feedback on their timeline preference. Written comments on the process timelines and REP Paper were due to BPA August 7, 2025.

Phase 2 – RPSA and ASCM Public Processes

BPA received comments from the IOUs, the Oregon Public Utility Commission, Northwest Requirements Utilities, Public Power Council, and Western Public Agencies Group (WPAG). No commenter supported Option 2’s accelerated RPSA development timeline. While one commenter requested a longer overall engagement than BPA presented, commenters’ general preference was for Option 1.

BPA appreciates the feedback from parties and will adopt Option 1 for the RPSA and ASCM processes. The schedule for the RPSA and ASCM workshops, with tentative topics, are provided in the Attachment 1. BPA will attempt to provide final topics and materials for the workshop three business days before each workshop. Initially, BPA intends to schedule two-day workshops for the relevant topics. These workshops may be reduced to single-day workshops depending on the pace at which the materials are being covered and participant engagement.

Workshop dates are identified with the reference to “RPSA WS” for an RPSA workshop and “ASCM WS” for an ASC Methodology workshop. Unless otherwise noted, all workshops will be at the BPA Rates Hearing Room in Portland, Oregon. Webex participation will be an option, though BPA encourages parties that intend to engage in significant discussions to be present. Start times for workshops will be provided on the BPA calendar.

Dates in *italics* with an “*” indicate dates for publication of documents or due date for comments.

At the conclusion of each workshop, BPA Staff will provide information on submitting feedback or informal comments on the materials presented. Typically, this feedback will be required within a week of the workshop. These opportunities to provide informal comments on the submitted material are not reflected in the attached schedule but will be discussed at the end of each workshop.

Following the conclusion of the RPSA and ASCM workshops, BPA will release for formal comment the RPSA and ASCM Drafts. The attached schedule provides tentative publication dates and formal comment period windows. Procedural details for submitting formal comments will be discussed at the final workshops for each process.

Phase 2 – Section 7(b)(2) Legal Interpretation and Implementation Methodology Process

Provided below is also a tentative timeline for the commencement of the 7(b)(2) Legal Interpretation and Implementation Methodology process. A more detailed schedule will be provided at or near the close of the RPSA and ASCM processes described above.

Bonneville greatly appreciates your engagement on the Post-2028 REP process and looks forward to collaborating with you in the coming months over this important component of the Northwest Power Act.

Sincerely,

Kim Thompson
Vice President for NW Requirements Marketing

ATTACHMENT 1

Workshop Dates	RPSA		ASCM	
Sept. 11-12, 2025	RPSA WS 1	<ul style="list-style-type: none"> • Introductions and Process Overview • Physical/Financial Exchange • Termination and Suspension • Defining Exchange Loads as a Billing Determinant 		
Sept. 23-24, 2025	RPSA WS 2	<ul style="list-style-type: none"> • In-Lieu and In-lieu Billing • Benefit Pass-through and Compliance • Remainder of RPSA Provisions 		
Oct. 9-10, 2025	RPSA WS 3	Day 1: <ul style="list-style-type: none"> • Complete previous WS content • Customer-led Topics and Open Discussion 	ASCM WS 1	Day 2: <ul style="list-style-type: none"> • Process Overview • ASCM Reorganized • Filing Procedures • ASC Review Process
Oct. 22-23, 2025	RPSA WS 4	Day 1: <ul style="list-style-type: none"> • Complete previous WS content • Customer-led Topics and Open Discussion 	ASCM WS 2	Day 2: <ul style="list-style-type: none"> • Inclusion of Costs in ASC (Transmission, others). • Exchange Period ASCs Determination • Endnotes and Remaining Provisions • Appendix Template and Forecast Model
*Oct. 29, 2025	BPA	<ul style="list-style-type: none"> • BPA releases preliminary full RPSA Draft. • Informal comments due Nov. 11. 		
Nov. 4-5, 2025	RPSA WS 5	Day 1: <ul style="list-style-type: none"> • Workshop on full preliminary RPSA Draft. 	ASCM WS 3	Day 2: <ul style="list-style-type: none"> • Complete previous WS content • Customer-led Topics and Open Discussion
*Nov. 11, 2025	Parties	<ul style="list-style-type: none"> • Parties' informal comments on full RPSA Draft due. 		
*Nov. 17, 2025	BPA	<ul style="list-style-type: none"> • BPA issues full RPSA Draft for formal public comment. • Formal comments due Dec. 18, 2025. 		
*Nov. 18, 2025			BPA	<ul style="list-style-type: none"> • Informal Release of the full ASCM Draft. • Informal comments due Dec. 9.

Nov. 20, 2025			ASCM WS 4	<ul style="list-style-type: none"> Workshop on preliminary ASCM Draft.
Dec. 9, 2025			<i>Parties</i>	<ul style="list-style-type: none"> <i>Informal comments on full ASCM Draft due.</i>
Dec. 18, 2025	<i>Parties</i>	<ul style="list-style-type: none"> <i>Parties' formal comments on Full RPSA Draft due.</i> 		
Jan. 12, 2026			<i>BPA</i>	<ul style="list-style-type: none"> <i>BPA issues full ASCM for formal comment.</i> <i>Formal comments due February 13, 2026.</i>
Feb. 13, 2026	<i>BPA</i>	<ul style="list-style-type: none"> <i>BPA issues Record of Decision on Final RPSAs.</i> <i>Final RPSAs Offered to IOUs (60 days).</i> 	<i>Parties</i>	<ul style="list-style-type: none"> <i>Formal comments on full ASCM due.</i>
April 3, 2026			<i>BPA</i>	<ul style="list-style-type: none"> <i>BPA issues ASCM Record of Decision on ASCM, and final ASCM.</i>
April 14, 2026	<i>Parties</i>	<ul style="list-style-type: none"> <i>IOUs execution of RPSA due.</i> 		<ul style="list-style-type: none">

Section 7(b)(2) Legal Interpretation and Implementation Methodology Process Tentative Timeline

Timeframe	Event
June-August 2026	Workshops to review 7(b)(2) IM/LI
September 2026	Begin Section 7(i) on Section 7(b)(2) IM/LI
April 2027	Final IM/LI on Section 7(b)(2) and ROD