

From: [Hill, Ann](#)
To: [REP2028](#)
Subject: RPSA Provisions - Sept. 11 workshop comment
Date: Thursday, September 18, 2025 10:13:41 AM

BPA,

NorthWestern Corporation provides initial, informal comments on Section 6, *Invoicing for Cost Benefits*, of the Residential Purchase and Sale Agreement ("RPSA").

NorthWestern supports Option 1 (rollover/historical method) because:

- Creates certainty and predictability of REP payments during the Rate Period.
- Administratively facilitates rolling over the current invoicing infrastructure.
- Does not require additional administrative actions, such as validation, on a monthly basis, of IOUs' residential loads, enhanced load validation during compliance reviews

Thank you,

Ann

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