

August 6, 2025

To: rep2028@bpa.gov

RE: PPC Comments on BPA’s Residential Exchange Program Public Engagement Processes and Timelines

Submitted electronically

Thank you for the opportunity to comment on the public engagement processes and timelines for BPA’s post-2028 Residential Exchange Program (REP). PPC¹ staff is preparing for Phase 2 of BPA’s public engagement process and continuing our best efforts to pursue settlement conversations with the investor-owned utilities.

The REP is extremely impactful to PPC members. In the absence of a settlement, it is imperative that BPA conduct a robust and inclusive process that considers perspectives from public power and investor-owned utilities. To have a truly inclusive process, BPA must offer a timeline that provides a reasonable opportunity for participants to prepare and consult with their decision-makers between sessions. Additionally, the process must be completed in time to ensure the decisions made following the process can be implemented as intended in the BP-29 Rate Case proceeding.

PPC staff recognizes the REP public engagement process represents a significant amount of work for BPA and public power. The timelines for making the REP decisions identified by BPA (and seeking approval from FERC when appropriate) are extremely tight. As such, we do not believe expediting the development of Residential Purchase and Sale Agreements (RPSA), which will delay the Average System Costs Methodology (ASCM) development, is appropriate considering the circumstances. Instead, PPC staff support Option 1 of BPA’s process timelines for the RPSA and ASCM because Option 1 will allow more time for BPA and stakeholders to meaningfully participate. While we are intrigued by the expedited timeline proposed by Option 2, we believe the risks of rushing to a conclusion in this process far outweigh the benefits of having final decisions a few months earlier. PPC staff believes the timeline presented in Option 1

¹ Public Power Council (PPC) is the umbrella trade association representing the interest of the Northwest’s non-profit, public power utilities that have preference rights to the output of the federal system. PPC’s members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost.

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is the better option available for developing the three critically important elements of the post-2028 REP.

PPC staff applauds BPA's decision to open a comment period on the timeline for this process. This sets the stage for productive engagement in the months ahead.

Sincerely,

/s/Tom Creekpaum

Tom Creekpaum

General Counsel, Public Power Council