

IOU Joint Comment

Post-2028 Residential Exchange Program Comprehensive Plan

August 7, 2025

Avista Corporation, Idaho Power Company, NorthWestern Corporation d/b/a NorthWestern Energy, Portland General Electric Company, PacifiCorp, and Puget Sound Energy, Inc. (collectively, "IOUs") have reviewed the Bonneville Power Administration's ("BPA") implementation plan for the post-2028 Residential Exchange Program. The IOUs appreciate BPA recognizing the importance of resolving issues surrounding the Residential Purchase and Sales Agreement ("RPSA"), Average System Costs ("ASC") Methodology, and Section 7(b)(2) legal Interpretation in a timely manner.

In response to BPA's request for comments on the timelines in the comprehensive plan, the IOUs as discussed below are generally in support of Option 1 and BPA's objective to offer final RPSAs for the post-2028 period as soon as practicable. Specifically, BPA has offered two options for consideration: Option 1 contemplates a RPSA Final Record of Decision ("ROD") in February 2026, while Option 2 contemplates an accelerated process, with the RPSA Final ROD in December 2025. While quick resolution is a priority, to allow for a more robust customer and stakeholder engagement process, the IOUs prefer Option 1, which assumes BPA can commit to issuing a Final ROD no later than February 2026. Any delay beyond February 2026 is not in the interest of any customer in the region.

The residential exchange program touches every residential and small farm customer in the region. These customers are served by public power utilities and investor-owned utilities and are only differentiated by who provides their service. It is important that every customer, regardless of provider, receives benefit from the federal power system. BPA's timely resolution of the RPSA is necessary to ensure those benefits are available to all customers in the region.