



February 11, 2026

Bonneville Power Administration
By e-mail to: techforum@bpa.gov

Re: Comments on BPA’s Public Involvement Policy

The Northwest & Intermountain Power Producers Coalition (“NIPPC”) submits the following comments in response to the Bonneville Power Administration’s (“BPA”) decision to review and update its Public Involvement Policy.

I. BACKGROUND

BPA developed its Public Involvement Policy in 1986 to implement the statutory requirements of Section 4(g)(1) of the Pacific Northwest Electric Power and Conservation Act which require the Northwest Power and Conservation Council and the BPA Administrator to engage with the public on regional power issues including providing information to the public, soliciting feedback from the public, and securing advice and consultation from BPA customers and others. NIPPC agrees that BPA’s Public Involvement Policy is ripe for review and potential changes.

NIPPC generally agrees with the scope of the review outlined in the presentation materials for the public meeting on February 3, 2026. NIPPC looks forward to reviewing staff’s specific changes to the Public Involvement Policy and anticipates providing detailed comments when BPA releases its proposed changes later this spring.

II. SPECIFIC COMMENTS

a. Public Comment Forums

NIPPC does not object to the proposal to eliminate some public comment forums. NIPPC agrees that written comments provide sufficient opportunity for stakeholders to provide input to BPA’s policy development process and that in some cases it is not necessary for BPA to hold public forums for stakeholders to provide oral feedback to BPA. In some forums, public comment periods could simply be integrated closely into public workshops (either with dedicated time or blended into the broader workshop) to ensure that stakeholders continue to have an opportunity to hear from each other in dialogue.

b. Time Allowed for Comment

NIPPC suggests that the timeline for submitting comments on major regional issues should continue to be 30 days. Staff appears to believe that technological changes in how BPA distributes notice of proposed policy changes and how stakeholders can submit comments might allow a shorter timeline. At the same time, however, technological advancements have also allowed policy proposals to become longer, more detailed, and more complex.¹ Stakeholders still need sufficient time to review, analyze, and respond to policy changes. NIPPC encourages BPA to retain 30 days as its default comment period.

c. Methods for Public Notification

NIPPC supports the proposal to review public notification methods. NIPPC encourages staff to consider updating BPA's notification methods to reflect new technology and current notification practices. NIPPC suggests that staff consider adding a calendar invite option to scheduled events posted to BPA's Events Calendar web page. As digital, remote events have proliferated, stakeholder and customer engagement is significantly improved with common calendar formats supported (e.g., Microsoft Outlook, Google, etc.). NIPPC also suggests developing a subscription option for specific policy proceedings to enable stakeholders to receive calendar invites automatically, rather than having to manually download each one (assuming a manual download option is created).

d. Other topics

NIPPC also encourages BPA to improve its document retention policy to ensure online accessibility of official files from past proceedings and initiatives. At the very least, final decision proposals and documents on major regional issues should be readily available and easily accessed on BPA's web site. All final policy proposals and decision documents should continue to be available even if they are later superseded or revised by subsequent decision documents. BPA should also generally retain draft policy documents and stakeholder comments in a digital library or docket format, consistent with how most other public agencies with similar ratemaking and policymaking roles retain information (including state utility commissions and the Federal Energy Regulatory Commission (FERC)). Ensuring that policy decision documents are easily accessible will allow staff and stakeholders to track policy evolutions over time and maintain an understanding about the bases for earlier policy decisions. Having access to the full context of past decisions will enable staff and stakeholders to better understand how to respond to new developments impacting the Pacific Northwest and help identify when circumstances have changed

¹ For example, BPA's proposed Day Ahead Market Draft Policy of March 2025 was 92 pages long.

enough to justify revisiting past policy decisions. FERC's eLibrary, for example, has a somewhat clunky interface but provides a thorough record that improves the quality of stakeholder and intervenor filings by improving their access to the policy and regulatory record. Ideally, BPA would have an equivalent database of its own.

Lastly, NIPPC encourages BPA to record more public meetings and workshops—again, similar to the norm for most public agencies that affect the power sector. The recordings of BPA's Evolving Grid stakeholder workshops, for example, were a valuable educational tool for stakeholders that expanded the reach of those meetings. In contrast, the many workshops on the Day-Ahead Market Policy were not recorded, or at least recordings were not posted. While BPA should determine an appropriate balance of such public memorialization of meetings, NIPPC notes that recordings of FERC Technical Conferences, for example, are routinely posted online by FERC.

III. CONCLUSION

NIPPC appreciates the opportunity to submit these comments. NIPPC looks forward to reviewing staff's detailed proposals to modify the Public Involvement Policy.