

Submitted to communications@bpa.gov on February 11, 2026

RE: Initial PPC Comments on BPA's Policy for Public Involvement Workshop

The Public Power Council (PPC)¹ appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) planned engagement with customers on its Policy for Public Involvement (PI Policy). As a federal entity with a public service mission that is accountable to the region, BPA has both a statutory and ethical obligation to conduct transparent public processes while making decisions that have significant financial and quality of service impacts on its customers. This obligation is enshrined in the Northwest Power Act, which is the basis for BPA's PI Policy, last updated in 1986. We appreciate BPA's stated commitment to adhere to the principles of the policy. PPC also agrees that revisions to the policy are necessary to ensure that the agency is appropriately engaging its customers in its decision-making processes consistent with the law.

BPA Preference Customers Are Uniquely Impacted by the Outcomes of BPA's Processes

As BPA considers updates to its PI Policy, PPC wants to highlight the unique relationship between BPA and its preference customers. These customers have funded the majority of the costs associated with the FCRPS and will continue to do so. The recently signed Provider of Choice contracts have codified the long-term continuation of that relationship and the continued commitment on behalf of preference customers to fund BPA's operations. To the extent that BPA makes any decisions or commitments that exposes the agency to additional costs, or that will impact the reliability or flexibility of the FCRPS, it is the preference customers who will bear the burden associated with that decision through their rates and quality of service.

BPA Must Provide Preference Customers Opportunities for Constructive Public Engagement

The effectiveness of BPA's PI Policy will be determined by both the policy itself and how the agency applies that policy. As part of this review process, BPA should make a firm commitment to preference customers that it will provide them with an opportunity for constructive public engagement prior to the Agency's commitment to any final decision, settlement or proposal that is expected to result in a significant financial commitment, irrespective of the confidentiality requirements of the process leading to such commitment. Without this commitment, PPC is concerned that BPA could selectively apply its PI Policy, particularly on sensitive issues, thereby circumventing receiving feedback from the customers responsible for funding its costs. We look forward to exploring with BPA what such a commitment could look like in this process.

¹ 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. PPC's members fully subscribe the firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system.

The Current Policy Lacks Specificity in Key Areas

PPC has historically and continues to be actively engaged in BPA's public policy processes across the board. In most instances, BPA's public policy processes are highly noticed, well communicated, and occur across a wide range of issues. There are recent instances however, that do not fit BPA's historic practices where BPA made decisions with major economic repercussions without adequately consulting its customers. A recent example of this is the lack of consultation with BPA's preference customers before BPA signed the 12/14 Columbia River System Operations MOU, which exposed the preference customers to hundreds of millions of dollars in additional costs under the MOU. One way to ensure that BPA is properly engaging customers prior to such significant decisions is to adopt a threshold for what constitutes "major regional power issues." Exploring the establishment of such a threshold should be a focus of BPA's PI Policy review process.

Additionally, the current policy does not clearly address situations where BPA is not the sole decision-maker. This should be added to the PI Policy scope. In the event that BPA is party to a public process, legal proceeding, settlement negotiation, or other effort to implement policies or make decisions that the Administrator can reasonably expect to represent a significant financial commitment, if preference customers are not already afforded such an opportunity, BPA should formally request that preference customers be permitted to participate in a manner that amounts to meaningful constructive public engagement.

Transparency with Preference Customers Will Strengthen the BPA and Public Power Partnership

PPC members are focused on providing their end-use customers with reliable and affordable electric service. For our members, BPA's preference customers, their success is closely tied to the success of the agency. This makes transparency and the opportunity to provide feedback to BPA critical for our members. We appreciate the effort that BPA is undertaking with its PI Policy review and look forward to further exploring changes to the policy that will further strengthen the BPA and public power partnership that is central to the economic success of our region.

Thank you for the opportunity to comment. We look forward to further engaging with BPA as well as future comment opportunities during the review of its PI Policy.