

## **Northwest & Intermountain Power Producers Coalition and Renewable Northwest Comments on TC-28 Workshop of April 29, 2026**

The Northwest & Intermountain Power Producers Coalition (“NIPPC”) and Renewable Northwest (“RNW”) submit the following comments in response to Bonneville Power Administration (“BPA”) staff’s presentation at the TC-28 kick-off workshop on April 29, 2026.

NIPPC is a membership-based advocacy group representing competitive electricity market participants in the Pacific Northwest and Intermountain region. NIPPC has a diverse membership including independent power producers and developers, electricity service suppliers, transmission companies, marketers, storage providers, and others. Nearly all NIPPC’s thirty members purchase transmission service from BPA. Renewable Northwest is a non-profit advocacy organization that works to decarbonize the region by accelerating the transition to renewable electricity. Renewable Northwest has more than eighty member organizations that include renewable energy developers and manufacturers, as well as consumer advocates, environmental groups, and other industry advisers. Many of Renewable Northwest’s members are also current or prospective BPA customers.

### **Scope of TC-28**

Staff asserted that BPA’s day-ahead market decision is out of scope for TC-28. BPA, however, has not yet issued a formal decision to join Markets+ yet staff is proceeding with an aggressive schedule of monthly (or more frequent) meetings to develop tariff language to implement Markets+. It is inappropriate for staff to proceed to work with customers to develop tariff language and an implementation timeline for BPA to join Markets+ until an Administrator issues a formal Record of Decision to join Markets+. NIPPC and RNW urge staff to delay start of work to implement Markets+ until after a Record of Decision is issued to join Markets+. We recognize that delaying tariff implementation work might extend the date that BPA could join Markets+.

### **Lack of Coordination Between Tariff and Rates.**

BPA has proposed to conduct and complete TC-28 – the tariff revision process to implement Markets+ – prior to beginning to work on developing rates to implement Markets+ in BP-29. Contrary to recent practice, BPA will not conduct a tariff revision process in parallel with BP-29. We are concerned that the lack of a tariff revision process conducted at the same time as the BP-29 rate case will result in a mismatch between the tariff and rates. As proposed, customers will have to work with BPA to develop tariff language without any understanding of the rate implications of the choices and decisions they make in TC-28. At worst, tariff language developed in TC-28 could have significant unintended consequences for transmission rates – particularly ancillary services rates and lock BPA’s customers into unnecessarily high ancillary services rates based on tariff language that could have been modified but would then be out of scope

of BP-29. Ideally, BPA would work with customers to develop tariff language and rates to implement Markets+ at the same time. In this way, customers and BPA would have the opportunity to optimize tariff and rates language together. We recommend that BPA commit now to conduct a narrowly tailored tariff revision process in parallel with BP-29 to allow customers and BPA to mitigate any potential rate impacts attributable to tariff language developed in TC-28.

### **BP-26 Rate Case Commitments**

A specific example of the types of interrelationships between rates and tariff are BPA's ancillary services rates. In the BP-26 settlement agreement, BPA committed to conduct a workshop on ancillary services because, despite discovery processes that should be available in a rate case, BPA staff refused to provide any of the data or analysis underlying their "belief" that ancillary services rates were set at an appropriate level.

The Markets+ tariff provides for significantly different resource adequacy and resource sufficiency mechanisms – including for ancillary services – than the paradigm BPA currently operates in and that was used to set rates in BP-26. In setting rates in the past, BPA has consistently refused to rely at all on any of the market mechanisms that exist within the WEIM paradigm to mitigate customers' ancillary services rates. BPA also failed to meet its commitment to customers to implement WEIM functionality to allow non-Federal generation to participate in the WEIM, compete with BPA to provide imbalance energy, and allow them to mitigate their exposure to BPA's ancillary services rates through market mechanisms. Considering these past practices and decisions by BPA staff, we have no confidence that BPA staff will propose to develop rates in BP-29 that incorporate the full functionality that the Markets+ tariff provides to reduce the reliance on the balancing area to provide many types of reserves. Rather, we are concerned that BPA will continue to insist on setting ancillary services at unjustifiably high levels that do not fully implement the market-based mechanisms available to provide energy for ancillary services within Markets+.

It is imperative that customers can work with BPA staff and other customers on tariff language and rates concurrently. Only through concurrent processes, can customers make informed decisions on tariff language with an understanding of the potential rate implications of those decisions. BPA should also schedule the BP-26 ancillary services workshop as soon as possible (prior to any discussion of ancillary services tariff language in TC-28) and provide the data and analysis that we have repeatedly requested. BPA should also commit to expand the scope of that settlement agreement commitment to specifically address ancillary services under the Markets+ paradigm, should BPA finalize a Markets+ participation decision.

Thank you for the opportunity to submit these comments.