



January 8, 2026

Bonneville Power Administration  
By e-mail to: [techforum@bpa.gov](mailto:techforum@bpa.gov)

**Re: BP26E Workshops**

NIPPC and RNW appreciate the opportunity to submit these comments.

**EIM Participation**

NIPPC and RNW are disappointed that BPA continues to suspend processing applications for non-Federal resource to become EIM Participating Resources and that BPA has not provided a timeline as requested for when that suspension will be lifted.

**Catch All Provision**

NIPPC and RNW are concerned with the proposed language that would require BPA to sub-allocate any new or amended neutrality and uplift charges in the EIM based on measured demand.

CAISO has recently added two new neutrality accounts to the EIM tariff effective May 1, 2026. BPA proposes to allocate the EIM Entity Real-Time Marginal Greenhouse Gas Cost Offset based on metered demand. BPA proposes to allocate EIM Transfer Revenue based on measured demand. NIPPC and RNW have no concerns with those proposals.

BPA, however, also proposes a “catch-all” provision that would apply to any new charge codes that the CAISO implements in the future. BPA proposes to allocate charges and credits under any new charge codes to measured demand. NIPPC and RNW note that of the two new charge codes, the CAISO will allocate only one based on measured demand. CAISO will allocate the other based on metered demand. NIPPC and RNW recommend that the catch-all provision should allocate charges and credits for any new charge codes consistent with the allocations specified in any future revisions to Section 11 of the CAISO tariff.

Thank you for the opportunity to submit these comments.