

Submitted to [techforum@bpa.gov](mailto:techforum@bpa.gov) on January 9, 2026

**RE: PPC Comments on BPA's December 15, 2025 BP-26E Workshop**

The Public Power Council (PPC)<sup>1</sup> appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) most recent BP-26E workshop. PPC supports the agency's efforts to quickly adopt rate changes to ensure that it can adequately pass along costs and credits related to EIM participation to ensure cost recovery after the updated CAISO tariff provisions go into effect through the end of the BP-26 rate period.

While generally BPA's approach appears reasonable, to better inform our comments, PPC requests a brief written summary on why BPA is proposing the specific allocation approach for the two new neutrality accounts. This could be provided in a short webinar or through materials posted on BPA's website.

PPC is supportive of adopting language that would allow BPA to suballocate any future changes to the EIM charge codes under section 29.11(e). As future changes to the CAISO tariff will have gone through a stakeholder process, the best approach may be to adopt the allocation method used in the CAISO tariff for BPA rates, assuming there is a corollary measurement that can be used (e.g. measured demand, metered demand, etc.). To the extent that there is not an equivalent or comparable measurement available on BPA's system, using measured demand as BPA proposes seems appropriate. This approach is recommended with the understanding that BPA would more thoroughly review allocation of the new charge code during the subsequent rate case. Additionally, if concerns arose requiring modifications sooner than the next rate case, BPA could always run an expeditated rate case as it is doing now.

PPC is hopeful that with some additional information BPA and customers may be able to settle the proposed changes in the BP-26E case quickly. Resolving this issue without running a full rate case is in the best interest of the agency and the region particularly given the number of crucial customer engagement processes that the agency will be conducting in 2026.

Thank you for the opportunity to comment,

Lauren Tenney Denison  
Chief of Staff and Strategic Initiatives  
Public Power Council

<sup>1</sup> 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 ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.