



Portland General Electric Comments on Centralized Electricity Markets Topics

WAC 173-441-124

May 20, 2026

Portland General Electric (PGE) appreciates the opportunity to provide input to the Washington Department of Ecology (Ecology) on composite source accounting in the proposed rule changes to WAC 173-441-124.

PGE is a vertically integrated electric utility engaged in the generation, purchase, transmission, distribution, and retail sale of electricity in the State of Oregon. PGE serves over 900,000 retail customers with a service area population of approximately 2 million comprising nearly half of the state's population.

PGE owns and operates the Tucannon wind facility in Columbia County, Washington and transacts power with Washington utilities and through the MID-C trading hub. While PGE currently only serves retail customers in Oregon, PGE announced an agreement in February 2026 to acquire select Washington state generation, transmission, distribution, and electric utility operations from PacifiCorp. These comments apply to PGE's existing work in the region, regardless of the acquisition.

Composite Source Accounting

We appreciate that Ecology added a new section on Composite Source Accounting, addressed in PGE's February 20, 2026, comments, as well as the Electricity Imports White Paper. Yet, we oppose the requirements in sub-paragraph (B) that the reporting entity must be able to claim the Washington generation source as a specified source of electricity meet seller warranty requirements.

While it seems that the intent of (B) is to meet the standard of "unambiguously shown to be supported by Washington generation sources" in subparagraph (A), we believe the conditions applied in (B) are too narrow. Demonstrating that the electricity was supported by Washington generation sources can be achieved through the purchase of unspecified energy if the purchase meets the documentation requirements listed in (E).

We echo the comments on composite source accounting submitted by the Western Power Trading Forum (WPTF) on this topic and suggest that Ecology add "or system" after "Washington generation sources" in sub-paragraph (A) and delete sub-paragraph (B).

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