

February 20, 2026

Department of Ecology
Climate Pollution Reduction Program
P.O. Box 47600, Olympia, WA 98504-7600

Re: Feedback requested on centralized electricity markets and electricity imports

Big Bend Electric Cooperative (Big Bend) is commenting on the Washington Department of Ecology's (Ecology) proposals with comments due on Friday, February 20th. There are several areas in which Big Bend is not able to provide detailed responses to, but wanted to share one area of concern.

"Deemed Market Importer" definition

Ecology requested comments on the existing definition:

““Deemed market importer” means a market participant that successfully offers electricity from a resource or system into a centralized electricity market and the electricity is assigned, designated, deemed, or attributed to be serving Washington electric load by the methodologies, processes, or decision algorithms that are put in place by the market operator of that centralized electricity market for purposes of reporting under this rule and approved by the department of ecology. For the energy imbalance market and extended day ahead market, the deemed market importer is the participating resource scheduling coordinator if the methodologies, processes, or decision algorithms by which the electricity is assigned, designated, deemed, or attributed to be serving Washington electric load for purposes of reporting under this rule are approved by the department of ecology.”

Big Bend is concerned with the “scheduling coordinator” phase. As a small utility without a real-time desk AND one that has the need for non-federal resources, we rely on outside scheduling coordinators (such as The Energy Authority, “TEA”) to schedule Big Bend’s contracted generation resources. Big Bend is concerned that the language as written without additional clarification will cause Big Bend’s carbon obligation to be linked to TEA or a similar scheduling coordinator’s carbon obligation either by transference or via corporate association. This would potentially prevent Big Bend and similarly situated small utilities from working with outside scheduling coordinators, to the detriment of our ratepayers. We believe this is an unintentional consequence of Ecology’s proposed language and urge you to clarify this definition to clearly tie carbon obligations to entities that have the rights to resource and system off-take they offer into a centralized market, not the scheduling entities they work with.

Big Bend needs to continue to have this contractual relationship with a scheduling entity that does not transfer the compliance obligation away from Big Bend.

Additionally, Big Bend has reviewed and supports the comments on this same topic submitted by PNGC and TEA.

Sincerely,



Christina Wyatt, Manager of Power Supply