



February 20, 2026

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

Submitted via Ecology's online public comment form –

Re: PNGC Power Comments on Ecology's Feb. 2, 2026 Request for Feedback on Centralized Electricity Markets and Electricity Imports

Pacific Northwest Generating Cooperating (PNGC Power) appreciates the opportunity to submit comments on the Washington State Department of Ecology's (Ecology) request for feedback on centralized electricity markets and electricity imports as part of the Washington State's Cap-and-Invest Program Updates and Linkage rulemaking process.

PNGC Power is an electric generation and transmission (G&T) cooperative owned by 25 Northwest electric distribution cooperative utilities with service territory in seven western states, including Washington.

PNGC Power generally supports making updates to definition of the "deemed market importer," which describes who is considered the "electricity importer" for electricity imported into Washington through a centralized electricity market (CEM). However, PNGC Power stresses the importance of thinking critically through the nuances involved in both market participation and operational scheduling functions in the context of a CEM, and contemplating the role of scheduling agents who perform work on behalf of utilities or asset owners.

For many small rural electric cooperatives, scheduling agents play a critical role which would otherwise not be possible in the transition to CEMs. PNGC Power believes Ecology should consider determining electricity importer responsibilities, perhaps through an attestation process, when a scheduling agent is acting as a market participant on behalf of utilities, asset owners, and/or end use consumers.

Further, PNGC Power has concerns with the proposal to change the definition of deemed market importer:

"Deemed market importer" means an asset owner that has its electricity successfully offered ~~a market participant that successfully offers electricity~~ from a resource or system into a centralized electricity market and the electricity is assigned...."

PNGC Power believes that a change is warranted to address concerns raised with the current definition. However, the proposal to insert the phrase "asset owner" may not sufficiently

capture multiple market participation scenarios while staying true to Ecology's intent to identify the market importer of electricity into the state of Washington. For instance, questions raised by this proposal include (a) How will this definition be applied when there is joint asset ownership, and market participation varies across the owners? and (b) How will the definition clarify responsibility when asset owners contract resources through bilateral arrangements, and the contract holder is the market participant and potentially the importer?

PNGC Power suggests that Ecology more clearly describe how the proposed change to the "deemed market importer" would satisfy scenarios of joint ownership models and contracted resource agreements in the context of CEMs.

PNGC Power understands the evolving nature of the WA Cap and Invest program, and appreciates Ecology's opportunity to provide comments, as well as a process that attempts to address the multitude of scenarios presented by CEMs. PNGC Power remains committed to working with the region on these important issues.

Sincerely,

A handwritten signature in black ink that reads "Christopher R. Allen". The signature is written in a cursive, flowing style.

Chris Allen
Chief Member Relations and Strategy Officer