

Portland General Electric (Nancy Bennett)

Portland General Electric Comments on Requested Feedback on Centralized Electricity Markets and Electricity Imports

February 20, 2026

Portland General Electric (PGE) appreciates the opportunity to provide input to the Washington Department of Ecology (Ecology) on several topics requested as part updates to reporting methods for electric power entities (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. While PGE currently only serves retail customers in Oregon, we own and operate the Tucannon wind facility in Columbia County, Washington and transact power with Washington utilities and through the MID-C trading hub.

Composite Source Accounting

PGE agrees that Ecology should incorporate a "composite source" accounting framework into rule that would allow entities to demonstrate that electricity imports from a "composite source POR" in a multi-state BAA was supported by energy being generated by a resource located in Washington.

PGE utilizes the MID-C wholesale interstate electric trading hub in Washington in two main ways: First, PGE brings energy transacted at this hub from resources around the West home to serve our retail customer load in Oregon. Second, PGE provides power to Washington utilities for Washington load through transmission paths through MID-C. In many cases, PGE may source or purchase power from a generator in Washington and then provide it via its MIDC Composite Source Point of Receipt to a Washington utility serving Washington load. Without a method like the "composite source accounting", Ecology is at risk of over counting emissions and PGE is at risk of being assigned an import obligation when the source of the energy delivery is in fact WA-sourced generation.

It is essential that entities like PGE have the ability to demonstrate that electricity sourced from a composite source Point of Receipt (POR)—such as the Mid-Columbia (MID-C) trading hub, located within a multistate Balancing Authority Area (BAA)—has been separately accounted for, particularly when the electricity originated from generation resources located in Washington or from a Washington-based BAA. Composite source Points of Receipt (PORs) aggregate electricity from multiple generators across state lines, so regulation must distinguish the origin of the electricity to avoid double counting emissions or overstating the volume of power considered imported under the Climate Commitment Act (CCA).

Providing a clear pathway, such as composite source accounting, for demonstrating that specific volumes of electricity came from in-state resources allows utilities to accurately account for emissions and prevents distortions in the program. Without this tool, imported power volumes are likely to be overstated, and entities like PGE may be penalized for "importing" electricity that has already been subject to CCA regulation at the point of generation.



PGE supports the development of an hourly reporting format to support composite source accounting that includes for each hour 1) the volume of transacted imports from a composite source POR, 2) the volume of electricity generated or discharged by a resource in Washington and 3) the net volume of imports after deducting generation by Washington resources. PGE also supports a requirement to retain data and document their composite source accounting to a verifier.

With respect to Ecology's question regarding specified source requirements, including seller warranty and direct delivery, we support the comments submitted by the Western Power Trading Forum (WPTF). As WPTF notes, specified source requirements are not relevant since electricity generated by a resource located within Washington does not meet the definition of imported electricity.

Energy Storage Systems

PGE is closely following the updates proposed by the California Air Resources Board (CARB) to evaluate how electricity storage systems should be addressed in emissions reporting and specified source claims. Given the evolving role of storage in regional markets, it would be worthwhile for Ecology to further examine an ESS framework and PGE supports inclusion of provisions to address ESS resources in this rulemaking.

Regardless of whether an ESS framework is incorporated into this rulemaking, imports from energy storage systems should be treated in a manner that prevents duplicative compliance obligations for the same underlying source of emissions.

Specified Source Registration

Ecology requested feedback on simplifying "specified source registration" in this rulemaking. PGE supports the proposed change to simplify specified source registration requirements, which currently impose unnecessary administrative burdens.

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