



Department of Energy

Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

February 6, 2026

Filed Via Web Portal: <https://carb.commentinput.com/?id=ekNF7qTx2h>

To: California Air Resources Board

Re: Comments in response to the Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation

The Bonneville Power Administration (Bonneville) provides these comments in response to the California Air Resource Board's (CARB) solicitation for comments on its Proposed California Corporate Greenhouse Gas Reporting and Climate-Related Financial Risk Disclosure Initial Regulation. Bonneville is a federal Power Marketing Administration within the Department of Energy and located in the Pacific Northwest. Bonneville markets power from the Federal Columbia River Power System across the West, including to California entities, and is a participant in the California Independent System Operator's Western Energy Imbalance Market. In addition, Bonneville owns and operates transmission infrastructure in California.

Bonneville appreciates that § 96071 (b) provides that the proposed regulation does not apply to: (1) federal entities and (2) business entities whose only activity within California consists of wholesale electricity transactions. The proposed regulations satisfactorily respond to Bonneville's [March 20, 2025 comments](#) on implementation of SB 253 and SB 261. Those comments explain why Bonneville believes these types of entities should not be covered entities under SB 253 and SB 261. For these reasons, Bonneville urges CARB to include the proposed exemptions listed in § 96071 (b) if it adopts the proposed regulation.

If you have questions, please contact Alisa Kaseweter at (503)312-6816 or Doug Marker at (971)533-0852.

Sincerely,

A handwritten signature in black ink that reads "Alisa Kaseweter". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Alisa Kaseweter
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