



Department of Energy

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

May 4, 2026

Filed Via Web Portal: <https://carb.commentinput.com/?id=5PhdbGHfs>

To: Clerk of the Board, California Air Resources Board

Re: Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (15-day)

The Bonneville Power Administration (BPA) provides these comments in response to the California Air Resource Board's (CARB) 15-day solicitation for comments on its modified text of the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. BPA is a federal Power Marketing Administration within the Department of Energy and located in the Pacific Northwest. BPA markets power across the West, including to California entities, and is a participant in the California Independent System Operator's (CAISO) Western Energy Imbalance Market. BPA is an Asset Controlling Supplier under CARB's program, marketing power from a system comprised of 31 federal hydroelectric projects located in the Columbia River basin, one nuclear plant, and some other small nonfederal power plants.

BPA provided written comments to CARB on March 9, 2026, that included concerns over the proposed definition of committed capacity in § 95102. Specifically, the originally proposed definition too narrowly defined committed capacity as electricity generation outside California contracted solely to meet resource adequacy obligations under specific California Public Utilities Code or local publicly owned electric utility requirements. BPA supports CARB modifying this definition to holistically include any energy contracted to California load that is registered as committed capacity with CAISO. The definition as modified appropriately acknowledges the variety of legitimate reasons for entering into a contract for procurement of energy.

Please contact me at (503) 312-6816 if you have questions about these comments.

Sincerely,

A handwritten signature in black ink, reading "Alisa Kaseweter", is positioned above the typed name.

Alisa Kaseweter
Climate Change Specialist
Intergovernmental Affairs
Bonneville Power Administration
alkaseweter@BPA.gov
503.230.4358 (o)
503.312.6816 (c)