



Department of Energy

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

March 9, 2026

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

To: California Air Resources Board

Re: Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions

The Bonneville Power Administration (BPA) provides these comments in response to the California Air Resource Board's (CARB) solicitation for comments on its Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. BPA is a federal Power Marketing Administration (PMA) 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 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 provides comments on CARB's proposed definition for committed capacity as it relates to CAISO markets and the outstanding emissions calculation. BPA believes the current definition of committed capacity in § 95102 too narrowly defines 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. The narrow scope created by the definition is unduly restrictive and overlooks other legitimate contractual commitments between power marketers and utilities that have historically been used to meet load in California and covered under the cap-and-invest program without leakage penalties. For example, BPA provides firm power to Surprise Valley Electrification Corp. under a long-term contract pursuant to federal statute. While this contract is for firm power deliveries from BPA's system, it is not technically "committed via a contract to meet a resource adequacy obligation for California load"

The implication that only capacity contracted for Resource Adequacy purposes would be excluded from the CAISO Outstanding Emissions Calculation does not reflect the broader reality of energy markets. Both CAISO's Western Energy Imbalance Market (WEIM) and its proposed Enhanced Day-Ahead Market (EDAM), as well as the Southwest Power Pool's Markets+, recognize contractual pathways for GHG zone attribution whether or not entered into explicitly for meeting Resource Adequacy mandates. CARB's current definition seems to suggest that emissions leakage occurs if a contract is not specifically entered into for Resource Adequacy purposes, an assumption not applied to bilateral market transactions today as CARB's current approach honors these contracts without imposing leakage penalties.

Therefore, BPA strongly recommends that CARB broaden the definition of "committed capacity" to encompass contracts for power purchases more generally. If CARB is more holistically concerned with leakage in the context of contracted for energy, it should revisit this in the broader context of both bilateral and organized markets and not just focus on CAISO markets.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Alisa Kaseweter", with a stylized flourish at the end.

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