Peninsula Light Co.

April 11, 2025

Dear Governor Ferguson,

Public power utilities from Oregon and Washington are compelled to respond to the April 8, 2025 letter from Oregon Governor Kotek and Washington Governor Ferguson, sent to the Bonneville Power Administration (BPA) with statements that were not informed by all perspectives of the utilities in these states, including the majority of the utilities which rely on their statutory right to BPA power to serve their communities. This oversight is regrettable and results in the Governors' positions not being informed by those who would be most directly impacted by BPA's decision. The Governors cite regional numbers in the letter which are not clearly cited and which we expect are based on a study with questionable assumptions, as has been discussed in depth as part of the BPA decision process.

There is a broad consensus among the majority of Northwest utilities about how to best provide value to, and protect the investments of, the ratepayers we serve. As we have stated both individually and in comments submitted on our behalf by regional trade associations including the Public Power Council (PPC), Northwest Requirements Utilities (NRU), and Western Public Agencies Group (WPAG), we support BPA moving forward with a decision to participate in Markets+ as proposed.

Failing to make a decision on BPA's proposed timeline comes at a cost. It would create additional uncertainty for both BPA and its customers and the region as a whole. We are at a pivotal moment, with an unprecedented opportunity to advance regional markets in the Northwest in an effort that has broad support from both consumer-owned and investor-owned utilities in the Northwest. Acting promptly to confirm BPA's decision to join Markets+ is essential to securing the benefits of day-ahead market participation for our customers.

We appreciate the interests of the Oregon and Washington state officials. We share their commitment to maximizing benefits for Northwest ratepayers and value their engagement on behalf of those ratepayers. However, after years of rigorous market design and analysis We strongly reiterate my perspective that the independent governance and the inclusive, representative policy development process embedded in Markets+ have produced a well-balanced market - one that is best positioned to deliver those benefits. The majority of utilities in Oregon and Washington are on record supporting this conclusion as well.

As a not-for-profit, member-owned cooperative, Peninsula Light Company is entrusted by our community to provide over 35,000 members with reliable, low-cost service. Affordable and reliable electric service is critical for the community that we serve and contributes to the health and economic wellbeing both locally and statewide. The service to this community is paramount in my mind as we support BPA's decision to pursue participation in Markets+.

BPA is not making this decision lightly or suddenly. The agency is concluding its decision process after nearly two years of continued transparent engagement and ample opportunity for stakeholder comments. It remains unclear what additional value would be gained from a 30-day extension for comments or a delay of BPA's decision. The Pathways timeline makes it clear that changes beyond the current Step 2 proposal - which falls short of meeting the independent governance expectations for BPA or our utilities - will not be achievable in the near-term.

We appreciate the engagement of regional stakeholders on this issue, including the elected officials from Oregon and Washington. However, we respectfully disagree with some of the perspectives expressed by those officials and continue to support BPA moving forward with its day-ahead market decision as proposed.

We look forward to engaging with the Governor's office in the future to ensure that the perspectives of all stakeholders within the state, particularly those holding the obligation to provide affordable and reliable electric service, are consulted on state positions.

Sincerely

Jafar Taghawi

Chief Executive Officer
Peninsula Light Company

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Chief Resource Officer Peninsula Light Company