



*Energizing Life in Our Communities*

April 9, 2026

Submitted via [techforum@bpa.gov](mailto:techforum@bpa.gov)

## **RE: Day-Ahead Market Readiness Public Workshop 2**

Snohomish PUD (Snohomish) appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) Day Ahead Market (DAM) Readiness workshop held on March 12, 2026. We commend BPA staff for the level of transparency thus far and for continued engagement with customers as BPA advances through a complex and consequential market transition.

### **Support for the DAM Readiness Schedule and Engagement Approach**

We support BPA's proposed DAM readiness schedule and appreciate establishing target dates related to major activities. Laying out a clear schedule is critical for customer planning.

To further strengthen customer engagement, we recommend supplementing large, stakeholder-wide workshops with smaller, targeted breakout meetings focused on specific customer types or topics. Smaller forums would allow for more detailed discussion of implementation impacts, assumptions, and edge cases that are difficult to address efficiently in large workshops. This approach would allow for more detailed exploration of assumptions, implementation mechanics, and reduce the likelihood of having to address late-stage issues as implementation progresses.

### **Snohomish Requests Additional Clarity on Commercial Model Classes**

Snohomish asks for further clarity on generation and load classification concepts, specifically for Load Following customers, and how those classifications would be applied in practice. Additional details would be helpful on:

- The criteria used to distinguish conforming from non-conforming load, including operational or contractual characteristics that BPA expects to consider.
- What events or changes could trigger a reclassification of a load from conforming to non-conforming (or vice versa), such as physical configuration or contractual arrangements.
- Classification or treatment of behind-the-meter generation resources and implications for generation owners
- Whether customers can fall into multiple commercial model classes and the resulting operational considerations

Clear guidance on these points will be important for customers as they engage in planning for DAM participation, generation portfolios, and evaluation of operational risks. Snohomish also stresses that maintaining customer optionality for resource market participation is important for supporting customer operational strategies and we encourage BPA to explicitly recognize this in future guidance or policy materials.

### **BPA's Planned Exit from the EIM is Prudent and Timely**

We support BPA's planned exit from the Western EIM on October 1, 2027, and recognize this step as a necessary and deliberate transition toward full readiness for Markets+ participation. BPA has articulated that the selected exit date provides operations staff sufficient lead time to complete workstreams related to the exit and will allow their staff to focus on technical aspects of Markets+ development. It will also reduce uncertainty for BPA customers. We encourage BPA to provide information on how balancing, reserves, and revenue impacts will be addressed in the interim period between the EIM exit and Markets+ go-live.

### **Snohomish Supports Transitioning to Southwest Power Pool (SPP) as Reliability Coordinator**

BPA's plan to transition reliability coordinator (RC) services to SPP is a reasonable component of its broader Markets+ readiness strategy. Integrating RC services into BPA's future market operator framework promotes operational consistency, reduces interface complexity, and supports more efficient coordination between market operations and reliability functions.

SPP's experience serving as both RC and market operator in other regions provides a strong foundation for this transition. We encourage BPA to continue engaging customers on the timing, scope, and operational implications of the RC transition, including any changes to procedures, data requirements, or coordination protocols. Early and clear communication will be especially important for customer staff and resource planning.

### **Conclusion**

In summary, we believe BPA's DAM readiness roadmap represents a coherent strategy for positioning BPA and its customers for long-term success in organized day-ahead markets. Continued transparency, firm milestones, and targeted customer engagement will be essential to realizing these benefits. We appreciate BPA staff's continued efforts and look forward to ongoing collaboration as Markets+ readiness advances.

Sincerely,



Garrison Marr  
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