

Submitted to techforum@bpa.gov on April 14, 2026

RE: PPC Comments on BPA's March 12 Markets+ Implementation workshop

The Public Power Council (PPC)¹ is appreciative that BPA has begun the important effort of working with its customers to ensure that the agency and its customers are collectively prepared for BPA's participation in the Markets+ day ahead market starting in October 2028. PPC supports BPA finalizing its decision in Markets+², in part to help provide customers with certainty about the next steps. The timelines presented at BPA's workshop help set important expectations for customers and clearly establishes the roadmap for market participation go-live.

PPC appreciates the information that BPA staff has provided to date. We are also encouraged that the BPA team has continued to seek feedback from customers. Partnering together to explore outstanding implementation issues will be particularly important for ensuring that BPA's Provider of Choice (POC) power contracts are implemented as intended.

The agency has begun work on its Markets+ commercial model, which will create the foundation for future work updating the POC contracts, transmission tariff, and transmission and power rates. As BPA establishes policies for how its power customers will interact with the market (for instance, determining in which cases they may serve as the market participant or asset owner) we appreciate the agency retaining as much flexibility as is reasonable, to allow the customer to opt in to take a larger role in managing their own loads and resources in the market. We understand this will not be practical in all cases and appreciate the opportunity for customers to continue to work with BPA to identify specific scenarios where this makes sense.

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. For these reasons, PPC members have substantial interest and financial stake in the BPA's participation in organized markets.

² <https://publiccomments.bpa.gov/Comment/ViewComment?CommentId=13087>

The graphical representation of the proposed commercial model relationships included in the workshop presentation was very helpful. We would request that going forward BPA continue to use these types of graphical depictions to help communicate how customers are interacting with the market. In the next workshop, BPA should bring examples that combine generation and load treatment for specific scenarios together. Bringing this together in a single example can help evaluate and ensure there is consistency between how the generation and load sides of transactions are settled.

PPC also requests that BPA more specifically build into its timeline an opportunity to engage with customers on technical requirements, such as potential meter upgrades, to allow sufficient time to complete any necessary changes.

PPC looks forward to continuing a high level of engagement between BPA and its customers as the agency works towards its planned October 2028 participation in Markets+. The implementation workshops, other identified workstreams, and potentially additional engagement opportunities with customers will be crucial for ensuring that the agency and its customers are able to maximize the benefits of Markets+ participation.