CEBA Corporate Energy Buyers Association

October 26, 2026

The Honorable Kyle Haustveit
Under Secretary of Energy
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585-0121

Re: Bonneville's market decision

Dear Mr. Haustveit:

The Corporate Energy Buyers Association ("CEBA") appreciates the U.S. Department of Energy's ("DOE") attention to the Bonneville Power Administration's (Bonneville) day-ahead market decision. We would like to take the opportunity to share our thoughts on these efforts.

CEBA is a business association representing the largest corporate buyers of carbon emissions-free electricity - comprising over $41 trillion in market capitalization. CEBA members include the largest hyperscalers, retailers, manufacturers, commodities providers, and many household names. Our members depend on an electricity system that is reliable, affordable, and secure, capable of supporting continued economic growth of American businesses.

The Pacific Northwest is home to a diverse and rapidly growing set of industries that are critical to maintaining the United States' economic strength, technological leadership, and global competitiveness. These industries, along with the broader regional economy, depend on access to reliable and affordable electricity. As electricity demand continues to grow, the resilience, efficiency, and cost of the power system will play an increasingly important role in supporting economic growth and attracting private investment.

Bonneville occupies a unique and indispensable role in ensuring the region's electricity system remains reliable and affordable for consumers and businesses. As a result, Bonneville's decision regarding day-ahead market participation will have lasting consequences for retail electricity rates, grid reliability, regional market integration, and the Pacific Northwest's ability to attract and retain investment and industry.

In February 2025 and April 2026, CEBA, together with large retail electricity customers, submitted comments to Bonneville regarding its evaluation of day-ahead market options. In those comments, we emphasized that any market participation decision should be supported by a complete, current,

1501 M Street NW, Suite 900
Washington, D.C. 20005
888.458.CEBA • CEBA.org

and transparent evidentiary record and should clearly demonstrate benefits to retail customers. We continue to believe that Bonneville's March 2026 proposed decision did not provide sufficient certainty regarding the impacts on affordability and reliability and did not fully evaluate governance reforms.

Since CEBA submitted these letters, the Regional Organization for Western Energy (ROWE) appointed a diverse and balanced inaugural board that is fully independent, with representatives from states across the West, including Idaho, Nevada, and Washington, as well as public power and community choice aggregators. The ROWE board will have sole authority over the Western Energy Imbalance Market (WEIM) and the Extended Day Ahead Market (EDAM), meaning it holds exclusive governance authority over the design of regional market policy rules that ultimately get filed with and approved by FERC.

CEBA is encouraged by Administrator Kavulla's commitment to review Bonneville's market decision and strongly supports the three market principles outlined in his September 3rd letter to the ROWE: "1) the ability to trust in the durability of the rules governing the market, 2) the depth and liquidity of the market, and 3) the impacts on reliability and economic efficiencies resulting from new seams between adjoining markets."

As DOE and Bonneville review this market decision, we encourage stakeholders to closely examine how participation in the ROWE would enhance reliability in the West, reduce market seams, support a more robust and economic market, and ultimately save large energy customers millions.

CEBA appreciates DOE's consideration of these comments.

Sincerely,
/s/
Nidhi Thakar
Senior Vice President, Policy
Corporate Energy Buyers Association
1501 M Street, NW, Suite 900
Washington, DC 20005
nthakar@ceba.org

Enclosures:

1. Comments on Bonneville's proposed final decision to join Markets+ in 2028, April 2026
2. Comments to Bonneville Power Administration on Day-Ahead Market Participation Evaluation, February 2025

cc:
The Honorable James Danly, U.S. Department of Energy, Deputy Secretary of Energy
Alex Fitzsimmons, U.S. Department of Energy, Associate Deputy Secretary of Energy
Travis Kavulla, Bonneville Power Administration, Administrator and Chief Executive Officer
The Congressional Delegations of Idaho, Montana, Oregon, and Washington