



Department of Energy

Bonneville Power Administration
P.O. Box 3621
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September 10, 2025

Filed Via Web Portal: <https://ww2.arb.ca.gov/public-comments/public-comments-august-21-2025-climate-disclosure-workshop>

To: California Air Resources Board

Re: Comments in response to CARB's August 21, 2025 Climate Disclosure Workshop

The Bonneville Power Administration (Bonneville) appreciates the opportunity to respond to the California Air Resources Board's (CARB) August 21, 2025 Climate Disclosure workshop. Bonneville is a federal Power Marketing Administration within the Department of Energy and located in the Pacific Northwest. Bonneville markets power from the Federal Columbia River Power System across the West, including to California entities, and is a participant in the California Independent System Operator's Western Energy Imbalance Market. In addition, Bonneville owns and operates transmission infrastructure in California.

Bonneville supports CARB's staff proposal for entities that would be exempted from SB 253 and SB 261 (see slide 18 of CARB's August 21 [presentation](#)). Specifically, Bonneville appreciates CARB's acknowledgement that government entities are not covered and do not need an exemption as they are not a business entity formed under California law. Additionally, Bonneville supports the proposed exemption for business entities whose only activity within California consists of wholesale electricity transactions that occur in interstate commerce. Bonneville refers CARB to Bonneville's [March 20, 2025 comments](#) on implementation of SB 253 and SB 261 for the reasons why Bonneville believes both of these types of entities should not be covered entities under SB 253 and SB 261.

If you have any questions, please contact me at 503.312.6816 or Doug Marker at 971.533.0852.

Sincerely,

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

Alisa Kaseweter
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