



*Energizing Life in Our Communities*

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

**RE: TC-27 Workshops**

Snohomish PUD (Snohomish) appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) TC-27 workshops held on March 18 and 19. Snohomish fully supports BPA's efforts to "get off pause" and resume the important work of evaluating transmission requests and granting firm service when appropriate.

**Snohomish Supports Settlement of TC-27 and Encourages BPA to Engage Stakeholders**

As the region moves towards implementing organized markets, clean energy requirements, and growing load needs, transmission is a critical component. All of these efforts require advance planning, in many cases years in advance to ensure the proper resources are in place to meet a customer's needs.

Settling the TC-27 process enables utilities to continue doing this vital work. Snohomish would support either a full or partial settlement of TC-27. As BPA engages stakeholders, we recommend that BPA consider proposals that:

- 1) Maintain cost causation principles and prevent cost shifts both between customer types and within product groups
- 2) Ensure BPA meets its OATT requirements to plan and provide firm network service to customers when possible
- 3) Provide affordable alternatives for customers seeking unavailable firm transmission while BPA evaluates all applicable and qualifying requests
- 4) Deliver clear policies with minimal post-settlement development or crafting

Snohomish believes the three-step process outlined in the March workshops generally moves the region in the right direction as an interim solution and there are some topics to address specifically.

### **Non-Trended Load Growth Threshold Set at 13 MW is Reasonable for an Interim Proposal**

Snohomish believes that BPA's 13 MW per facility threshold to trigger a commercial study process is appropriate to help ensure cost causation principles are upheld. This threshold will help identify new loads that could add strain to the network and appropriately study those loads for potential impacts.

Snohomish encourages BPA to provide the draft Business Practice language with a settlement proposal to help ensure clarity around BPA's policy and enable negotiations to be fully informed. The business practice should have clear definitions and procedures for ensuring the threshold is measurable, workable, and enforceable.

### **BPA Should Provide Examples of What Evidence Would be Required to Identify Source/Owner Validation Concurrent with Settlement**

An outstanding item from the Source Owner Validation discussion is what evidence would be required to demonstrate that the Transmission Service Request (TSR) owner has a "business relationship" with the source owner. Snohomish expects situations requiring this validation would be edge cases but wants to ensure that the evidentiary process is not overly burdensome or would unduly delay the granting of a TSR.

### **Transmission Request Policies involving Batteries should have an Established Policy**

While Snohomish supports BPA staff's current leaning regarding the treatment of batteries within the TSR process, a timeline for developing a battery policy should be memorialized within a proposed settlement. Battery storage will likely play a significant role in future efforts to decarbonize, meet shifting capacity needs, and even provision of transmission congestion relief. Establishing a policy regarding batteries and their role within transmission service should be a priority for BPA.

### **Snohomish supports BPA's proposed CFS product for NITS customers and Recommends a Waiver or Fee Reduction Process for CFS Analysis**

Snohomish broadly supports BPA's efforts to make offers of service to ready customers as soon as practicable. However, a high cost of entry could unduly impact smaller customers based on their need and request. Snohomish recommends that BPA consider adding a fee waiver process that could help alleviate upfront costs for simply applying to have CFS studied for both NITS and PTP customers.

### **TSRs with *De Minimis* Impacts should be Reenabled for Both PTP and NITS Customers on the Same Timeline and Should Not Limit Redirects**

By definition, *de minimis* reservations have no significant impact upon the transmission system and should be quickly reenabled. Snohomish supports a settlement component that would resume processing TSRs with *de minimis* impacts as soon as possible for both PTP

and NITS customer requests. BPA should consider the most equitable approach to processing *de minimis* requests, Snohomish suggests BPA consider an approach that allows immediate processing of *de minimis* requests that were in the queue at the time of the pause while reenabling processing for new requests from PTP and NT customers on the same timeline.

Snohomish also believes that BPA should not impose any limitations on PTP redirects that have *de minimis* impacts, provided the redirect is within its unconditional window.

### **BPA should Issue a Draft NT Business Practice as Part of Settlement Discussions**

Many of the proposals that are anticipated to be part of settlement will rely on or interact with the overall operation of the NT product. BPA should ensure that customers have a proposed draft NT business practice to support informed decisions and facilitate clear settlement discussions. Snohomish would have difficulty evaluating many aspects of the settlement proposals without a draft NT business practice for reference.

### **Conclusion**

It is evident that BPA staff have worked hard to provide process options and perspectives that balance as many stakeholder positions as possible while trying to adhere to the core principles of fair and equitable OATT service. Snohomish appreciates BPA's efforts and looks forward to engaging in settlement discussions.

Sincerely,



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