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BONNEVILLE POWER ADMINISTRATION
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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments concerning BPA TC-27 Pre-Proceeding Workshop Topics

Seattle City Light (City Light) appreciates Bonneville Power Administration (BPA) engagement with customers regarding BPA's transmission planning reform. Please accept the following comments.

General Comments:

City Light applauds BPA for undertaking a reform process regarding transmission planning and granting transmission service. Staff's hard work and dedication are appreciated.

City Light recommends that future state should include BPA granting Conditional Firm Service (CFS) upon request that is firmed up by BPA completing needed transmission expansion projects in 5-6 years. Granting CFS should be the norm with very few exceptions for specific sub-grid constraints.

City Light believes if BPA granted CFS with sufficient minimum contract length, limited deferral, and securitization; most speculative requests would remove themselves from the queue under this framework.

BPA should embrace the possibility that additional projects may be needed to accommodate firming up the granted CFS. It is an opportunity for BPA to serve clear customer needs. It is an opportunity for BPA to prove they can be nimble when necessary.

Processing De Minimis TSRs

City Light supports BPA un-pausing processing De Minimis TSRs, FTSRs, and Long-term Redirects. City Light requests BPA start as soon as possible.

NITS Forecasts

City Light supports BPA Establishing a bright line facility level forecast between FTSRs that require commercial study and those that do not. City Light supports the BPA proposal as an acceptable compromise.

City Light recommends BPA develops minimum site control, commercial viability, and financial security requirements for new NITS customer load's qualifying for inclusion in transmission planning. Stranded asset costs should not be passed on to all customers through transmission rates.

City Light suggests BPA institute a strict policy mechanism to require NITS customer physical interconnection capacity to be equal to or greater than the reserved NITS transmission to deliver to that interconnection. This would alleviate the need for a mechanism to prevent an entity from overscheduling their load growth to bank future transmission capacity.

Need for Additional Evaluation Criteria

City Light believes that the need for more evaluation criteria would be unnecessary if BPA granted CFS with sufficient minimum contract length, limited deferral, and securitization. Most speculative, predatory, and duplicative requests remove themselves from the queue under this framework.

Evaluation Criteria Source Maturity

City Light supports EC-SM-ALT-5: Completion of GI Phase One Cluster Study AND Execution of GI Phase-Two Cluster Study Agreement

Evaluation Criteria Load Maturity

City Light supports EC-LM-ALT-2: Facilities Study required to be completed.

City Light requests BPA develop minimum site control, commercial viability, and financial security requirements for new NITS customer load's qualifying for inclusion in transmission planning as an alternative to this option. Stranded asset costs should not be passed on to all customers through transmission rates.

Evaluation Criteria RAS Resource

City Light understands in some circumstances, institution of a RAS scheme is preferable to the time and costs of the alternative transmission expansion projects. City Light recommends that BPA weigh the long-term regional interests of customers in transmission expansion before instituting additional RAS schemes. Specifically, building additional capacity across either the Cross Cascades North or South Paths would be preferable to SCL than providing RAS resources to enable TSRs in the long term. Specifically, SCL is opposed to requiring arming of Puget Sound Area load to enable greater Cross Cascades North TTC.

City Light supports EC-RAS-ALT-4: Require prior to decision to build the relevant project(s).

Evaluation Criteria Battery to Battery

City Light recommends BPA develop a more comprehensive policy concerning storage devices addressing the concerns regarding these devices being both a source and a load. SCL understands BPAs concerns regarding these locations being used as de Facto wheeling points and believes this could be addressed through scheduling practices.

Evaluation Criteria Additional Data

City Light supports EC-ADD-ALT-1: Modify section 17.2(x) and 29.2(ix) to read "Attachment K and other BPA transmission planning processes".

Evaluation Criteria Delivering/Receiving Party Validation

City Light suggests that applying these criteria pose unnecessary risk for BPA. Instituting CFS with sufficient minimum contract length, limited deferral, and securitization would preclude the need for this imperfect option.

Long-term Firm Queue Management

City Light believes that the need for more evaluation criteria would be unnecessary if BPA granted CFS with sufficient minimum contract length, limited deferral, and securitization. Most speculative, predatory, and duplicative requests remove themselves from the queue under this framework. Existing service, including NWACI capacity would be protected by interim service of a NERC 6 level that would be curtailed prior to any existing firm service.

City Light additionally recommends BPA institute a policy change of not allowing deferral of service or extension of commencement of service longer than 24 months. City Light suggests that the current deposit requirements for deferral or extension of commencement should be increased to the deferral period plus five years of service amount.

Transition Studies

City Light recommends BPA move to conduct the first round of proactive planning studies as soon as possible. This should include BPA actively participating in the upcoming NERC 2026 Probabilistic Analysis Forum in March followed by a workshop for BPA to discuss high level assumptions and methodology with customers.

City Light suggests BPA evaluate if a robust first round of proactive planning is sufficient to establish proactive planning. This would allow BPA to shorten the transition period leading to the future state.

Final thoughts

City Light suggests that any combination of policy choices will be in vain unless BPA can quickly accelerate transmission expansion project completion. The current pace of completing the existing transmission expansion project is not fast enough. Business as usual in scoping, environmental review, and construction will not meet customers' or the region's needs

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cc: Melanie Jackson, Bonneville Power Administration