



April 7, 2026

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 BPA consider the position they are asking customers to accept: Proposing many unattractive policy changes with great additional costs on top of the recent 24% rate increase for PTP customers without any promise of a better future state. City Light recommends BPA provide written commitments on proactive planning timeline and explanation of proactive planning principles.

City Light requests BPA consider that they are proposing City Light provide BPA with approximately \$180,000,000 in fees and deposits for their existing TSRs in the queue without any certainty of receiving any transmission capacity. City Light suggests BPA consider how a credit rating agency might view this type of contractual arrangement and performance risk.

City Light requests that BPA fully institute a Pro Forma process for addressing NITS transmission needs. This should include processing all NITS needs as separate (F)TSRs for award queueing and monitoring as E-Tag enabled transmission. City Light is returning to this position after the failure of a reasonable compromise.

Processing De Minimis TSRs

City Light believes BPA has no valid explanation for not processing De Minimis redirects today. De Minimis redirects do not encumber additional transmission in a material way. De Minimis Redirects do not have material negative impact on existing PTP or NITS service. This policy choice is punitive to only PTP customers. The stated BPA proposal does not include a specific date BPA will start processing De Minimis redirects. This is not acceptable to City Light. City Light recommends BPA start processing De Minimis redirects as soon as possible.

NITS Forecasts

City Light considers that BPA's latest proposal to track the growth of large distribution connection "facilities" in each NITS customer service territory is administratively improbable. The BPA suggested misuse of an industry defined term, facility, to support this policy is problematic at best. It provides a framework where any NITS load growth is unlikely to be required to go through commercial transmission planning. BPA should base transmission planning needs and requirements on the projected load growth at each physical BPA equipment point connecting the NITS customer systems.

Step 1: Customer Submittal

City Light supports keeping the existing queue and granting transmission service in queue order. City Light supports delaying a full commercial study leading to a Plan of Service (POS) until proactive planning is established. However, City Light requests written commitments from BPA regarding conducting three or more proactive planning development customer workshops, completion date of proactive planning establishment, and completion date of the planned commercial study.

Non-Trended Load Growth: City Light objects to the proposed BPA policy of tracking the growth of large distribution connections in each NITS customer service territory as a bright line to determine the need for commercial transmission planning. This is administratively challenging and likely lead to hyper-scaler sites being designed with multiple individually named distribution service connections to avoid transmission costs.

Step 2: Apply Evaluation Criteria

City Light suggests that these efforts to reduce the size of the queue will not reduce the queue to a size that can be studied in one batch. City Light additionally believes that some of these criteria may be successfully challenged under open access principles.

Readiness Criteria

City Light recommend that BPA consider that readiness criteria for acceptable TSRs should be applied equally to both resources and loads. City Light suggests that loads should not be considered likely until there are similar site control and commercial viability requirements are met.

Battery-to-Battery (EC-B2B)

City Light recommends BPA consider addressing all bulk power storage devices, including batteries, as both a resource at maximum discharge and as a load at maximum charging. City additionally recommends BPA allow TSRs to facilitate storage devices delivering or receiving power to any scheduling point or from any scheduling point. City Light requests BPA provide a commitment to have a public process to work with customers regarding bulk power storage devices. City Light additionally suggest BPA review and incorporate the 2018 FERC orders 841 and 2222 guidance in its policy decision.

Virtual Hubs (EC-VHUB)

City Light request BPA considers that entities using virtual hubs for load service cannot rely on reassessment service as a long-term option due to its high risk or not being renewed every two years. This type of service does not support any associated investment activity in infrastructure.

City Light requests that similar service is offered to both PTP and NITS customers at Virtual Hubs. i.e. If PTP requests can only be granted reassessment CFS, then NITS can only be granted reassessment CFS as well.

Step 3: CFS Transition Study

Contingent CFS Analysis Agreement

City Light supports the CFS analysis agreement framework of fees and security obligation. This level of costs are acceptable only with a written commitment by BPA to provide Conditional Firm Service by a specific date.

CFS Transition Processing Fee and TSR Deposit: City Light requests that these funds be designated to the related CFS Transition Analysis and associated resource costs. Funds not used by the completion of the CFS Transition Analysis should be returned to the Analysis funding group. The ongoing costs associated with additional resources should be included in the next Integrated Program Review and transmission rates starting October 1st of 2028.

City Light request tariff language that customers can withdraw a TSR that has not executed a Plan of Service (POS) contract at any time without penalty or withholding of security deposit.

Cumulative Demand Policy

City Light requests BPA to consider that this policy will have the effect of forcing new resources to contract with one off-taker very early in the development process. This is not helpful for both entities seeking new resources who do not want to take that early development risk nor resource developers who do not want to be tied to just one-off taker. This will discourage resource developers from making any early transmission requests. This will disadvantage PTP customers and have a chilling effect on resource development.

RAS Resource (EC-RAS)

City Light request tariff language stating that RAS Resource requirement is specifically only associated with requiring arming sources of energy, not residential customer loads.

Increased Operations Constraint Management (IS-POPT-ALT-8)

City Light supports BPA offering as much CFS as possible under this proposal. City Light requests a BPA commitment to hold workshops with customers developing additional congestion management tools.

Allow Mid-Term Offers w/o Subgrid Check (IS-POPT-ALT-9)

City Light requests BPA recognize that Reassessment Service is an inferior product and contains great risk for entities relying on transmission capacity for load service. This product is better than the

alternative of not serving load. City Light requests BPA to consider that a principle of the future state proactive planning is that BPA will plan and complete transmission projects in a timely manner so that no customer must choose this product to serve load.

City Light does not view Reassessment service as a viable outcome to paying tens of millions of dollars in study cost, non-refundable fees, and ten-year security deposit. City Light supports BPA providing this additional tool for customers to obtain service in the transition period while removing subgrid as an obstacle. City Light City Light request BPA develop and execute projects to alleviate subgrid constraints limiting load service during extreme weather events as part of their Attachment K planning process.

City Light thanks BPA staff for their time and hard work on transmission planning reform.

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cc: Melanie Jackson, Bonneville Power Administration