



April 10, 2026

Bonneville Power Administration
Administrator/Chief Executive Officer
Via email: techforum@bpa.gov

Re: Comments Concerning TC-27 March 18-19, 2026 Pre-Proceeding Workshops

Dear Bonneville Power Administration:

Pacific Northwest Generating Cooperative (PNGC Power) is submitting comments to help further inform and shape Bonneville Power Administration's (BPA) TC-27 Tariff Proceeding as recently discussed during the March 18-19, 2026 workshops.

Walking through the transition Business Model as presented by BPA staff, PNGC Power would like to highlight support or concerns on certain elements of the proposed process:

13 MW Non-Trended Load Growth Threshold

PNGC Power recognizes that BPA has established 13 MW as the threshold for determining Non-Trended Load Growth (NTLG). While it would be preferable to see this threshold set at a higher number, setting a line anywhere will have an impact on customers. PNGC Power appreciates and supports the clarification staff presented that this threshold would remain at a per facility level and that once firm service is granted the NTLG designation expires for that request.

Conditional Firm Service Agreement

BPA's proposal to impose a non-refundable \$50,000 per TSR fee plus a \$1,000 per MW fee (subject to true-up) to accompany the Conditional Firm Service Analysis Agreement appears unsupported by a clear cost recovery framework and should not be adopted as proposed. These fees do not appear tied to the actual, incremental costs BPA incurs to process individual customer requests. Instead, the structure and scale read as punitive and are more likely to discourage the submission of necessary TSRs that BPA's Network Integration Transmission Service (NITS) customers need for prudent planning, reliable service and regulatory compliance. Combining an exorbitant non-refundable deposit with a sliding scale deposit is confusing and risks skewing customer behavior by pricing access to BPA's processes instead of recovering BPA's actual administrative and study costs.

Before moving forward, PNGC Power recommends that BPA provide, at a minimum, the following to justify any fee structure:

- A detailed accounting of the cost categories each fee component is designed to recover, including which costs are fixed and which vary with study size, MW level, or TSR type.

Pacific Northwest Generating Cooperative 8440 SE Sunnybrook Blvd □ Clackamas, OR 97015
(503) 288-1234 □ Fax (503) 288-2334 □ www.pngcpower.com

- BPA’s historical actual costs for comparable studies, including ranges and averages, so customers can assess whether the proposed fee levels are reasonably calibrated.
- An explanation of how the \$50,000 fixed fee would be reconciled, if at all, to actual costs if the per-MW component is already subject to true-up.
- A demonstration that the combined fixed and variable fees will not recover more than BPA’s actual, prudent costs for the work performed on that individual TSR.

Absent this information, BPA has not met the basic showing needed for customers to evaluate whether the proposal reflects cost-based cost recovery rather than a deterrent or penalty. PNGC Power requests BPA either (1) remove the non-refundable fixed TSR fee and rely on a single true-up mechanism tied to actual costs or (2) materially revise the proposal with a transparent, cost-supported allocation of what each fee recovers and a safeguard to prevent over-recovery.

Security

PNGC Power strongly opposes BPA’s proposal to impose financial security requirements on NITS customers for CFS transmission service. This proposal is not cost based, not risk based and is inconsistent with BPA’s own precedent. BPA has previously recognized that NITS customers warrant different treatment than PTP customers. In BPA’s 2008 to 2010 Network Open Season filing at FERC, BPA proposed to exempt NITS customers from security obligations when the customer satisfied tariff attestation requirements. That record reflects BPA’s prior judgment that NITS service presents a fundamentally different risk profile.

BPA is taking a one-size-fits-all, shotgun approach that ignores the higher level of service NITS customers already pay for and improperly treats NITS customers as if they present the same risk as PTP customers. NITS customers are load-serving entities with generally strong credit quality and a statutory obligation to serve load, meaning they cannot simply walk away from service in the way a PTP customer can, which materially reduces the default risk that financial security is intended to address. Layering a CFS related security requirements on NITS customers would therefore be an unnecessary barrier that delays prudent planning and compliance-driven transmission decisions without improving BPA’s financial position.

PNGC Power recommends BPA retain the approach BPA endorsed in the 2008 to 2010 Network Open Season process: exempt NITS customers from CF-related security obligations when the customer meets tariff attestation requirements.

CFS Off-Ramps

BPA’s proposed customer off ramps for CFS are inadequate. Most are triggered only after an unreasonably long period of time, such as waiting 10 years for a CFS offer, or hinge on BPA determinations that customers cannot control, influence, or plan around. PNGC Power recommends adding additional clear near-term off ramps that allow customers to withdraw within short, defined timeframes without forfeiting the large deposits when BPA cannot timely advance the request or when material assumptions change and the CFS no longer meets the customer’s documented need.

PNGC Power recommended additional short time period off ramps include the following:

- Cost increase off ramp (30 days): If BPA revises the cost estimate or deposit requirement upward by more than a defined threshold (for example 10%), the customer may withdraw within 30 days of notice with a refund net of the documented actual costs.
- Material assumptions change off ramp (30 days): If BPA changes material study assumptions or inputs (queue position treatment, topology, major modeling assumptions, deliverability criteria), the customer may withdraw within 30 days of notice with a refund net of the documented actual costs.
- Interim results off ramp (30 days): After BPA provides preliminary findings showing the request is not feasible as submitted or would require upgrades beyond a stated customer cap, the customer may withdraw within 30 business days with a refund net of the documented actual costs.
- Customer load or compliance driven change off ramp (30 days): If the customer's underlying need changes due to a documented load forecast revision, resource plan update, state or federal compliance requirement, or governing board action, the customer may withdraw within 30 days with a refund net of the documented actual costs.
- BPA withdrawal/deferral off ramp (immediately): If BPA pauses, defers, or re-scopes the study for reasons not caused by the customer, the customer may withdraw immediately with a refund net of the documented actual costs.

Collaborative and Transparent Discussions

While the examples that BPA has presented have been helpful, additional examples will be critical for the next steps as language is developed for the Tariff and the associated business practices. PNGC Power is requesting that BPA provide an updated comprehensive process flow complete with a decision tree that illustrates how requests would move through the entirety of the TSR process from start to finish and with specific examples for the different TSR types and identification of the timeline and costs associated with any steps listed. PNGC Power believes that this level of detail is critical to ensure that parties have a consistent understanding of the process being developed.

PNGC Power appreciates Bonneville's collaborative approach to meeting the transmission service needs of its customers on a long-term, sustainable basis. It is recognized that there are no easy solutions and that difficult decisions will need to be made. BPA's obligation is to proactively plan, maintain and build a transmission system that will ensure reliable, long-term, firm service to its preference customers and the load growth customer's forecast. PNGC Power looks forward to continuing to work with the agency and its staff to resolve the current set of challenges together.

Sincerely,

/s/ Laura Dombrowsky

Laura Dombrowsky
Transmission & Power Contracts Manager
PNGC Power