Brookfield Renewable Comments on BPA's December/January TC-27 Pre-Proceeding Workshops

---

Brookfield Renewable Trading and Marketing LP (BRTM) and Brookfield Renewable Energy Marketing US LLC (BREMUS), collectively, Brookfield Renewable, appreciate the opportunity to provide these comments on the Bonneville Power Administration's (BPA's) December and January TC-27 pre-proceeding workshops.

<u>Objectives</u>

The January workshops briefly discussed objectives of the TC-27 proceeding. Brookfield Renewable supports the following objectives:

- **Un-pause the Queue** – Brookfield Renewable believes that it is imperative to meeting the regions clean-energy and capacity goals and needs to un-pause the existing queue and process commercially viable and ready transmission queue requests.
- **Provide Conditional Firm Service (CFS)** – In parallel with the above objective of un-pausing the queue, and in the absence of being able to provide firm transmission service or plans-of-service for firm service, Brookfield Renewable strongly supports BPA providing some form of CFS immediately, and through any interim/transition period.

Brookfield Renewable believes the above objectives are consistent with those articulated at the January meetings by the Northwest and Intermountain Power Producers Coalition (NIPPC)/Renewable Northwest (RNW).

Ideally, Brookfield Renewable would like to see BPA move ahead over the next several years in parallel and both study and process the existing queue and implement its "future state" proactive planning process, i.e., build out the grid based on identified load and resource portfolios/needs. Brookfield Renewable understands the workload and staffing challenges associated with completing that work in parallel. Brookfield Renewable fully supports any and all BPA efforts – both from a staffing and budgetary perspective – to hire additional staff and/or outsource necessary work. Notwithstanding that ideal path – unpausing the existing queue and implementing proactive planning – Brookfield Renewable believes it is imperative that BPA let commercially viable and ready projects and transmission requests proceed. Processing these requests must be a high priority. Further delay in letting these projects and requests proceed will compromise meeting established clean energy goals and undermine reliability.

<u>Preferred Alternatives</u>

As detailed in the attached workbook, Brookfield Renewable supports the following alternatives proposed by BPA:

<u>Evaluation Criteria</u>

Source Maturity

EC-SM-ALT-1- For transition, only accept GIs that are late stage or bypass. Importantly, Brookfield Renewable recommends adding an additional requirement to further screen GI projects in late stage or bypass. Brookfield Renewable recommends that projects be required to have executed engineering and procurement (EPC) agreements and committed capital to their projects, thus indicating a commitment to move forward and complete their projects.

On a long-term “future state” basis, Brookfield Renewable could perhaps support processing projects who have executed LGIAs (EC-SM-ALT-2). However, while Brookfield Renewable supports milestones, like LGIA execution, as a measure of a projects commercial readiness, per the existing BPA process, LGIA execution occurs too late in the process (e.g., after permitting) and thus would unnecessarily delay securing TSRs. Therefore, absent a change there in the process, perhaps execution of the GI facilities study report could suffice (EC-SM-ALT-3).

Load Maturity

EC-LM-ALT-6 - No requirement for LLIR submittal. While Brookfield Renewable appreciates BPA’s desire for clarity on the POD as well as POR side, Brookfield Renewable does not support LLIR requirements for PTP customers. Per BPA's problem statement, this issue appears to be primarily related to NITS customer load growth. Thus, imposing LLIR-related requirements on non-loading serving customers would unnecessarily constrain securing TSRs for point-to-point customers. Moreover, entities like project developers and power marketers, unlike load serving entities, do not have input to or control over the LLIR process. Alternatively, Brookfield Renewable supports BPA securing further clarity on POD requirements via some appropriate form of sending/receiving party validation.

RAS Resource

EC-RAS-ALT-4 - Require prior to decision to build the relevant project(s). Brookfield Renewable supports BPA's use of RAS and other SPS to both maintain reliability and total transfer capacity/capability (TTC). Brookfield Renewable does not have a final position on this issue, but it is unclear to Brookfield Renewable why such issues cannot be addressed on a case-by-case basis through any adjoining BAA's "affected system" tariff provision (since the customer is likely going through the host BAA’s GI process). Moreover, Brookfield Renewable is concerned that individual transmission customers (individual project developers) may not have the resources/flexibility to address BPA concerns and that ideally these are addressed through BAA-to-BAA discussions before project energization.

PTP requests to NT PODs

EC-PTP-ALT-4 - Status Quo. Brookfield Renewable does not have a final position on this issue, but supports retaining the status quo since this appears to a limited circumstance. Brookfield Renewable anticipates that NITS customers/LSEs will likely reflect total resource/load needs in their LARC's and related LLIR requests, even those potentially served through PTP transmission service. Brookfield Renewable opposes only letting NITS customers submit TSR requests at a NITS point (EC-PTP-ALT-3), as this would unnecessarily constrain arrangements between NITS customers and potential suppliers; NITS customers may in fact want suppliers to make any necessary PTP firm transmission service arrangements.

Battery-to-Battery

EC-B2B-ALT-2 - Allow battery-to-battery F/TSRs if Customer can provide reasonable scenarios. Brookfield Renewable does not have a vested interest in or final position on this issue, but supports letting customers support specific business cases.

Additional Information

EC-ADD-ALT-1 - Modify section 17.2(x) and 29.2(ix) to read "Attachment K and other BPA transmission planning processes". Brookfield Renewable does not object to the proposed language. Brookfield Renewable understands that BPA functions on this basis today.

Virtual Hubs | Mid-C and NW Market Hub

EC-VHUB-ALT-1 - Remove Mid-C Remote only - see Sub-Alternatives (SUB). Per Brookfield Renewable's earlier comments, Brookfield Renewable does not oppose BPA removing MidC Remote as a long-term POR/POD TSR option and to conforming outstanding TSR requests to MidC Remote to NWHUB or one of the nearby transmission systems. Brookfield Renewable also believes this is consistent with actively supporting use of NWHUB on a long-term basis (EC-VHUB-ALT-6). Brookfield Renewable understands that by conforming MidC-Remote requests to NWHUB, BPA can avoid having to address a number of sub-grid constraints that complicate awarding CFS to customers. Brookfield Renewable also does not oppose maintaining the status quo (EC-VHUB-ALT-7), although Brookfield Renewable understands that may be a sub-optimal option for the reasons stated above.

Delivering/Receiving Party Validation

EC-PV-ALT-1 - Require confirmation of Delivering/Receiving Party; if not remove from queue. Consistent with its earlier comments, Brookfield Renewable supports some form of delivering party validation, but that BPA should not rely exclusively on executed contracts. Brookfield Renewable also supports, as noted below, also permitting a financial demonstration (EC-PV-ALT-4) and/or relying on a FERC market-based rate authority demonstration (EC-PV-ALT-5), thus perhaps supporting marketer needs, especially at points like NWHUB.

Minimum Capitalization Requirements

EC-MCAP-ALT-1 - Minimum capitalization requirement scaled based on level of transmission service request activity in study. Brookfield Renewable could support minimum capitalization requirements based on level of transmission service, with exemptions, as proposed by BPA. While Brookfield Renewable generally supports BPA's proposal, Brookfield Renewable does not oppose maintaining the status quo.

Interim Service

Product Options

IS-POPT-ALT-4 - CFS - PTP vs NITS. Brookfield Renewable supports BPA providing conditional firm service based on a combination of system conditions or a number of hours analysis to commercially ready projects. This appears to be perhaps a combination of Alternatives 4 and 5. Brookfield Renewable supports these options as it may provide both BPA and customers greater flexibility in awarding and receiving CFS. Consistent with Brookfield Renewable's earlier comments, Brookfield Renewable requests additional info regarding the extent to which the "new" CFS differs from the CFS offered today and where on the spectrum of “firm” it lies. Based on BPA’s statements at the workshops, Brookfield Renewable anticipates the interim CFS will likely be closer to today’s CFS – thus pretty firm – and less like a non-firm or highly interruptible service that would not suit customer’s needs.

Finally, Brookfield Renewable notes that at the January 15, 2026, customer-led workshop, BPA rolled out two additional alternatives (IS-PO-ALT-8 and 9). BPA characterizes IS-PO-ALT-SUB-A and SUB-B as “Increased PTP (and NITS) CFS Offering through Operations Constraint Management.” BPA also characterizes those alternatives as having an ”Increased likelihood of offers compared to other options.” Consistent with the above, Brookfield Renewable supports examination of alternatives that may increase offers of CFS. Brookfield Renewable encourages further evaluation of these alternatives and further explanation from BPA of how those alternatives compare to those using CFS system conditions and/or % of hours.

Mandatory v. Voluntary

IS-MV-ALT-2 - Not mandatory until POS has been developed. Brookfield Renewable supports this option, as it should award CFS to those customers most ready to take service, yet also provide customers with needed certainty regarding a path to firm service. Brookfield Renewable would also support the status quo (IS-MV-ALT-3), with no mandatory requirement.

While Brookfield Renewable acknowledges that a mandatory take requirement could focus service requests and offers on those participants most ready to take service – which aligns with its goal to secure service for commercially ready projects – it is unclear how a mandatory service requirement would work in conjunction with other elements of the proposal (e.g., deferrals, re-directs) and whether there would need to be exemptions for circumstances where project delays are the result of circumstances outside the control of the customer.

Curtailment Type

IS-CT-ALT-2 - System condition and/or x% number of 8760 hours of the year. Brookfield Renewable supports this option based on BPA staff's representation that it could be a means to offer the most amount of CFS. As noted above, Brookfield Renewable recognizes, and cautions, that the desire for the "most amount" of CFS needs to be balanced against the need for a nearly/mostly "firm" service. Brookfield Renewable also supports consideration of Alternative 8, discussed by BPA at the January 15, 2026, customer-led workshop.

Queue Management

Applying Evaluation Criteria to Queue

QM-ECQ-ALT-1 - Keep existing queue. Brookfield Renewable supports this two-part option (applying evaluation criteria, as modified above, to the existing queue) as a means to mostly quickly un-pause the queue and move to provide firm or CFS service to those most ready to need service. Brookfield Renewable supports relying on existing information and, as necessary, securing additional information from customers as a means to apply the proposed evaluation criteria. Brookfield Renewable does not support either emptying the existing queue (QM-ECQ-ALT-2), and presumably requiring customers to reapply, or entering into agreements (QM-ECQ-ALT-3) in order to apply the criteria; both would unnecessarily delay the process.

Collecting New Evaluation Criteria

QM-CEC-ALT-3 - Combine ALT-1 and ALT-2. As noted above, Brookfield Renewable supports BPA working with existing information and having customers supplement, as necessary. Brookfield Renewable believes that this is the most expeditious way to un-pause the queue and apply the new evaluation criteria.

Structuring the Queue for Study

QM-SQS-ALT-2 - Batch Studies – Queue order. Brookfield Renewable strongly supports conducting a transition study as a means to quickly award available firm or conditional firm transmission service to requests/projects most ready to meet the region's clean energy and capacity needs. Brookfield Renewable believes that by applying the proposed evaluation criteria, as modified by Brookfield Renewable above, to the existing queue, that the study size will be manageable, i.e., able to be studied and solved. Brookfield Renewable also supports, as necessary, prioritizing the study based on source/load maturity, so as to expedite the process for those projects most ready to move forward. Brookfield Renewable is concerned that prioritizing based on other criteria (e.g., geographic, POR/POD, LSE v non-LSE, NITS v. PTP) would be arbitrary, potentially discriminatory, and add odds with advancing those requests/projects most ready to move forward.

Handling New (F)TSR Submissions

QM-HNS-ALT-2 - Study (F)TSRs in Proactive Planning Program (Future State). Brookfield Renewable supports studying all TSRs submitted after August 15, 2024, as part of the future state. Brookfield Renewable presumes that most of these requests are not associated with commercially viable/ready projects necessary to meet 2030 goals and reliability needs.

Firm Service Prioritization

QM-FSP-ALT-2 - Prioritizing Service Readiness. Brookfield Renewable supports firm service prioritization based on readiness.

Proactive Planning

Transition Studies

PP-TS-ALT-2 - Full SIS with Decision Point, prior to full POS or **PP-TS-ALT-5** - Study to Resolve Interim Service Ineligibility. Brookfield Renewable supports conducting a feasible transition study and prioritizing the study of commercially ready requests/projects. Thus, Brookfield Renewable does not support moving directly to future state studies and thus not unpausing and studying the existing queue. Based on what Brookfield Renewable understands of the study options, this eliminates alternatives 8, 3, and 4 (with 3 and 4 characterized as pilot studies for future state). Brookfield Renewable also does not support one-off/specialized studies, such as it understands the scope or usefulness of alternatives 6 and 7. Brookfield Renewable therefore supports alternative 2, primarily because it is focused on a limited queue size (which could be achieved through application of the evaluation criteria to the existing queue, as modified by Brookfield Renewable above)) and appears to be a fairly complete study, i.e., one with perhaps less surprises down the road. Alternative 5 is also attractive, because, as noted above, Brookfield Renewable supports providing as much CFS as possible in the short- to near-term and could prioritize CFS to commercially ready projects.

Conclusion

Brookfield Renewable appreciates the opportunity to provide these comments on BPA's TC-27 workshops. Brookfield Renewable supports the identified scope and objectives of the TC-27 proceeding and urges BPA to move ahead expeditiously in addressing the issues and implementing the necessary reforms so that commercially related projects and related transmission requests can proceed and thus help satisfy the region's pressing needs.