From:	James Dykes
To:	Tech Forum
Cc:	Ion; Dawn Van Diest; Michael Frantz; Andrew Munro; Jeff Grizzel
Subject:	Proposed TC-27 tariff settlement
Date:	Friday, October 16, 2026 4:01:23 PM
Attachments:	image.png GPUD TC-27 Settlement - Limited Informal Objection - Final.pdf GPUD TC-27 Settlement Term Sheet Counterproposal - Final.pdf GPUD TC-27 Settlement Counterproposal - Final.pdf TC-27 - Interim CBM, Interim Service & Queue Management - Grant PUD.pdf TC-27 & GAT Comments - Grant PUD.pdf

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Good afternoon,

Hope you're doing well and Happy Friday! Please find Grant PUD's limited informal objection to the proposed TC-27 tariff settlement. Additionally, Grant has attached all previous comments provided previously in the record of the informal objection process.

Please confirm receipt

Thanks!

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"Awareness is the greatest agent for change."
Eckhart Tolle

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October 16, 2026

To: BPA and TC-27 Settlement Parties

Grant PUD Comments | Proposed TC-27 Tariff Settlement

Pursuant to BPA's Tech Forum notice of October 2, 2026, Grant County PUD submits this limited objection to the proposed TC-27 Settlement concerning customer-provided and third party redispatch and the treatment of Grant's TSRs to align transmission requests with Grant's final CHWM. Grant supports the objectives of moving the Transition Planning Process forward, clearing the Transmission Service Request (TSR) queue, and enabling pending TSRs to be evaluated and awarded during 2027. Grant does not object to the express language of the Settlement package.

First, the Settlement does not address customer-provided or third-party redispatch as expressly permitted under section 15.4(b) of BPA's OATT or the potential coordination of federal, non-federal, and Market Operator redispatch. During the TC-27 workshop process, Grant requested that BPA develop a Business Practice governing customer-provided or third-party redispatch and establish a framework for integrating non-federal redispatch if and when BPA participates in a Day-Ahead Market. These mechanisms could support additional Conditional Firm Service awards and improve utilization of the federal transmission system. Grant requests that BPA agree to finalize and adopt such a BP on the schedule identified in §3.e of the Settlement Term Sheet regarding the Customer Build Option.

Second, the Settlement does not explicitly allow customers to reduce requested transmission quantities during the Transition Planning Process, even when such a voluntary reduction could enable an award of Conditional Firm Service (CFS) or firm service both to the requesting customer and to other customers. This issue is particularly significant for Grant. In March 2025, Grant submitted eleven PTP TSRs for service beginning October 1, 2028, based on BPA's then-current calculation of Grant's Contract High Water Mark for federal power and recommendations from BPA Power and Transmission staff. BPA subsequently changed its CHWM calculations and announced a substantial reduction in Grant's anticipated CHWM in August 2025. Grant is currently challenging that reduction through litigation.

Because of the uncertainty of Grant's final CHWM, Grant's awarded CFS rights may exceed the capacity needed to deliver Grant's federal power. Requiring Grant to contract for a larger amount of transmission capacity than ultimately needed could create significant security obligations, excess transmission charges, and stranded costs for Grant's retail customers. It would also reserve transmission capacity that Grant cannot fully use and that may not be efficiently remarketed through bilateral or organized markets, and that would not be available to other customers in the queue.

Grant believes that a practical alternative would allow customers to reduce TSRs to match transmission capacity to the customers' anticipated needs at the time of the CFS award. In Grant's case, the multiple PTP TSRs share the same Point of Receipt and Point of Delivery on OASIS, although each request is tied to a specific generating source in the FCRPS. Grant understands that BPA is considering this option but may not be able to provide a substantive and affirmative response within the deadlines of the TC-27 Settlement process.

The interaction between BPA's CHWM and TC-27 decisions creates a material risk that Grant's federal power rights and transmission rights will be significantly misaligned. Grant submitted its PTP TSRs in good faith based on BPA's own calculations. Grant relied on BPA's recommendations for the details of those TSRs. BPA should provide a reasonable mechanism to address the consequences of its subsequent CHWM changes as part of source validation or other step in the TC-27 Transition Planning Process.

For these reasons, Grant submits this limited objection concerning customer-provided and third-party redispatch to the proposed TC-27 Settlement as presently offered. Grant appreciates BPA's confirmation that a workable solution exists for Grant's pending PTP TSRs and will continue working with BPA to define the available options, timing, and protections for Grant's existing requests and queue position. Grant otherwise supports the Settlement and does not seek to delay its implementation. Grant is prepared to withdraw this objection if BPA provides written assurance that it will promptly initiate a separate Business Practice process, public workshop, or comparable stakeholder process to address Grant's redispatch concerns and continues to work with Grant to provide a satisfactory path forward to align the TSR requests with the final CHWM requirements. Grant reserves the right to (i) supplement, modify, or expand upon these comments, (ii) to raise any additional issues, concerns, or objections in response to positions, comments, or objections identified by other parties in this proceeding, and (iii) submit further comments and submit testimony and briefs in any formal TC-27 proceeding.

Grant remains committed to working constructively with BPA on a timely resolution of these two omissions that supports both Grant's needs and the broader objectives of clearing the queue via offers of Conditional Firm Service. Please confirm receipt and include this email and Grant's previously submitted TC-27 comments in the record for the informal objection process.

Thank you.

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Lon L. Peters (Lon@nw-econ.com)

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To: BPA and TC-27 Settlement Parties

Grant PUD Counterproposal to BPA's TC-27 Settlement Proceeding

Grant County PUD appreciates the opportunity to review and submit a formal counterproposal on the term sheet provided. We understand a lot of work went into the discussions to create the term sheet as was provided. Below are two additional items that Grant PUD recommends appending to the term sheet as previously provided.

Create new §2.d.1.b. of Term Sheet draft of 6.10.26 (and/or elsewhere if appropriate)

b. All phases of the Conditional Firm Analysis will include arrangements for any self-provided redispatch and/or redispatch arranged by the Transmission Customer from a third party resource, in order to comply with Section 15.4(b) of BPA's current OATT: "A Transmission Provider shall not unreasonably deny self-provided redispatch or redispatch arranged by the Transmission Customer from a third party resource." Prior to commencement of any Conditional Firm Analysis, BPA will adopt a Business Practice for self-provided and third-party redispatch, which will set forth all required elements of a new Data Exhibit for such redispatch. Third party redispatch includes any reliance on or compliance with the operations of an organized Day-Ahead Market (DAM), including but not limited to Markets+ (SPP) and Enhanced Day-Ahead Markets (CAISO), and including redispatch instructions of the Market Operator. BPA commits to coordinate all Conditional Firm Analysis, including but not limited to "revisits" in §2.d.iii.2., with BPA's preparations for its own participation in any DAM, and will demonstrate in such Analysis that implementation of CFS by BPA will be fully integrated with BPA's participation in such DAM. BPA will offer an additional form of CFS that (a) extends beyond the "go-live" date of BPA's participation in any DAM and (b) explicitly relies on the redispatch of federal and non-federal resources via participation in a DAM or other protocol as agreed between BPA and the Transmission Customer. This additional form of CFS will not be offered if BPA reverses its decision to participate in a DAM, but will be offered if BPA changes its participation from one DAM to another DAM.

Add to §2.d.iii.1 (new "first" and new "second", adjust remaining language as needed)

In order to comply with Section 6 of the Columbia River Transmission System Act (1974), BPA will give first priority to Valid Transmission Requests for "capacity required to transmit electric power generated or acquired by the United States." To enable performance under fully executed contracts, BPA will give second priority to Valid Transmission Requests that demonstrate the complete execution of Power Purchase Agreements by both Buyer (at the POD) and Seller (at the POR) [define]. If Buyer and Seller are the same entity, this demonstration is waived.

Thank you for the opportunity to provide this counterproposal. Grant PUD looks forward to collaborating with BPA and the other parties during the Settlement process and future discussions.

Submitted by:
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Lon L. Peters (Lon@nw-econ.com)

Grant County
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To: BPA and TC-27 Settlement Parties

Grant PUD comments and counterproposals in BPA's TC-27 Settlement Proceeding

The main issue that Grant is seeking to highlight in its recommendations is that Grant has executed a Provider of Choice (POC) power purchase agreement (PPA) with BPA, providing for delivery of a Slice/Block of federal power starting October 1, 2028, for which Grant does not yet hold transmission rights. BPA's one-customer/one-product/one-contract policy also means that Grant requires new Network Integration transmission rights to deliver power from the Grant Balancing Area to Grant's retail loads in Grand Coulee, Washington. Grant currently does not hold the transmission service rights required to deliver the power purchased under the POC contract, and requests that BPA recognize its obligations under its foundational statutes, contractual commitments, and the Provider of Choice policy to provide new long-term transmission service to Grant beginning on October 1, 2028. BPA's obligation extends beyond the sale of power to include providing the transmission service needed to deliver the power and ensure that federal power is delivered to BPA's preference customers.

During the recent Settlement discussion on April 30, 2026, BPA staff suggested that there will be no priority given to the processing of TSRs related to the transmission of federal power as part of the Transition Studies. Grant should have similar transmission service being provided to all other Preference customers. Grant is seeking assurance that the required Agreements for Interim PTP and NITS Service will be effective October 1, 2028, and will be executed in early 2027, to ensure that Grant is receiving the power purchased from BPA and can transmit non-federal power in compliance with BPA's power contract policies.

Thank you for the opportunity to provide these comments and share the unique circumstances that Grant is facing. Grant looks forward to collaborating with BPA during the Settlement process and future discussions as well.

Submitted by:
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Lon L. Peters (Lon@nw-econ.com)

Confidential Settlement Communication
GPUD REDLINES TO BPA Initial Settlement Proposal
Version: May 15th, 2026

Document Key:

- Blue shaded rows = Initial Settlement Position is different than BPA Staff Leaning.
- Green highlight = Specific differences between Draft Settlement Position and BPA Staff Leaning.
- Blue highlight = Topics in which BPA is open to considering other reasonable or mutually agreeable proposals.
- Yellow highlight = GPUD Comments provided.

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
1	**New Cutoff Notice for Potential Eligibility to First Transition Study.**	• Not addressed.	• BPA's cutoff for the first transition study will be January 1, 2026, consistent with the notice to be provided on June 1, 2026. • BPA would be open to consider other mutually agreeable dates. • GPUD supports the BPA cutoff date for the first transition study. If alternate cutoff dates are considered, study priority should be given to TSRs with power supply contracts already signed by all parties (e.g., POC) that require transmission by 10/1/2028.	• Transition
2	**Transition Study Eligibility**	• BPA will use the existing long-term transmission service request queue to determine the eligible (F)TSR in the Transition Study. • The following LTF PTP TSRs and NTLG LaRCs are eligible to be included in the Transition Study: 1. Unstudied Complete Applications for long-term firm point-to-point transmission service requests (TSRs) submitted before the Transition Study Deadline. 2. Unstudied Complete Applications for non-trended load growth LaRCs submitted to and received by BPA between August 15, 2024, and the Transition Study Deadline. • NOTE: A Completed Application includes the deposits, fees, and requirements set forth in sections 17.2 and 29.2 of the Tariff and BPA's business practices. Customers do not need to re-submit their (F)TSRs/completed applications to be eligible for the Transition Study.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • GPUD requests BPA give priority in the first batch of studies to new POC contracts starting delivery on 10.1.28. Additionally, priority in the first batch of studies should go to those TSRs that include an offer to redispatch non-federal power to help manage congestion on federal grid, to customers who got into the TSR queue before 1.1.26, and to customers willing to commit to redispatch in Markets+.	• Transition
3	**Collecting New Evaluation Criteria**	• BPA will apply evaluation criteria to each eligible (F)TSR in the Transition Study using the existing data exhibit form, processes, and deadlines as provided for in the Requesting Transmission Service Business Practice.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • GPUD requests that BPA clarify customers who got into the TSR queue before 1.1.26 and who were told by their AE not to make any deposits because the queue was “paused” receive priority for the first batch of studies.	• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
		• Per the Requesting Transmission Service Business Practice, BPA will notify the Customer if there are any deficiencies found during the evaluation criteria validation and the Customer will have (5) Business Days from the receipt of BPA's notice to cure any deficiencies. If the Customer fails to cure the identified deficiencies in that time period, the TSR will be declined and removed from the queue with no further consideration for LTF service.		
4	**Evaluation of Battery to Battery or Battery Cited as Load**	• BPA will decline battery to battery LTF (F)TSRs and any (F)TSRs delivering to a battery that is cited as stand-alone load (POD), unless/until BPA adopts a policy to allow batteries as "load" for LTF transmission service. • This Evaluation Criteria is applicable to (F)TSRs in the Transition Study and to (F)TSRs submitted after the deadline to be included in the Transition Study.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • BPA would be open to considering a commitment to establishing a policy on treatment of batteries in our planning processes as agreed to in settlement • GPUD recommends that if a TSR identifies a POR/POD pair connecting two non-federal BAs using federal transmission, both of which have multiple potential sources (resources) and sinks (loads), BPA should not attempt to identify the source or sink of the power at the POR/POD (e.g., a specific BESS or other resource). BPA should adopt a policy ASAP stating such. Utilities and resource developers should be able to use their transmission rights without BPA "looking behind" the borders of the BAs to find a specific resource or load. Once Markets+ starts running, least-cost unit commitment and dispatch for all capacity and energy services will rely on BESS schedules and BESS redispatch by the MO that change over time depending on economics and status of the storage units.	• Transition
5	**Evaluation Criteria: Source Maturity for (F)TSRs Submitted by the Established Transition Study Deadline**	• All eligible (F)TSRs in the Transition Study must meet the following source maturity requirements, otherwise the (F)TSR will be declined and removed from the long-term firm transmission queue. • The (F)TSR cited resource must be: a. An existing interconnected resource, or b. For requests seeking physical interconnection to BPA's network where the cited generator interconnection resource does not yet exist, the cited generator interconnection resource must meet one of the following criteria: i. The cited generator interconnection resource is currently in a late stage or bypass stage of the Large Generator Interconnection Transition Process, in accordance with Attachment R of the Tariff and the Large Generator Interconnection Transition Process Business Practice. ii. The cited resource is located outside of the Bonneville BAA that is not interconnected or seeking physical interconnection to Bonneville's BAA.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • BPA would be open to considering reasonable source maturity evaluation criteria for resources physically interconnected outside of BPA's BAA. • GPUD recommends that a fully executed power purchase agreement (e.g., POC contract) with a defined start date should be considered "fully mature".	• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
		• This Evaluation Criteria is only applicable to eligible (F)TSRs in the initial Transition Study.		
6	**Evaluation Criteria: Source Maturity for (F)TSRs Submitted after the Established Transition Study Deadline**	• All (F)TSRs submitted after the established Transition Study deadline must meet one of the following source maturity requirements, otherwise the (F)TSR will be declined. a. The cited large generator interconnection resource has executed a Phase Two Cluster Study Agreement, in accordance with Attachment R of the Tariff; or b. The cited large generator interconnection resource has completed the Phase One Cluster Study and has an executed Phase Two Cluster Study Agreement, in accordance with Attachment L of the Tariff; or c. The cited small generator interconnection resource has completed a System Impact Study, in accordance with Attachment N of the Tariff; or d. The cited generator interconnection resource is located outside of the Bonneville BAA that is not interconnected or seeking interconnection to Bonneville's BAA. • This Evaluation Criteria is only applicable to (F)TSRs submitted after the deadline for inclusion in the initial Transition Study. BPA will provide notice prior to implementation of Proactive Planning (future state) where all TSRs submitted after the notice date will be studied in Proactive Planning (not the transition process).	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • BPA would be open to considering reasonable source maturity evaluation criteria for resources physically interconnected outside of BPA's BAA.	• Transition • Future State
7	**Evaluation Criteria: Source Owner Validation of Non-Affiliated Requestors**	• For TSRs citing a source that is/will be physically interconnected to BPA's network, and for which the TSR submitter is not the cited source owner or an affiliate, BPA will require evidence of a business relationship with the source owner (i.e., generation facility owner affirms that the TSR may be used to transmit power from the cited source). Without such evidence, the TSR will be declined and removed from the transmission queue. • This Evaluation Criteria is applicable to (F)TSRs in the Transition Study and to (F)TSRs submitted after the deadline to be included in the Transition Study.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop.	• Transition • Future State
8	**Evaluation Criteria: Load Maturity**	• LLIR maturity is required when the (F)TSR will be used to serve a new load that requires an LLIR. If Line Load Interconnection Request (LLIR) is needed, Facilities Study is required to be completed, otherwise the (F)TSRs will be declined and removed from the queue.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • BPA would be open to considering other mutually agreeable approaches to evaluating the load maturity of an (F)TSR.	• Transition • Future State

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
		• This Evaluation Criteria is applicable to (F)TSRs in the Transition Study and to (F)TSRs submitted after the deadline to be included in the Transition Study.		
9	**Evaluation Criteria: PTP Request to Serve NITS Load**	• If an (F)TSR cites a NITS POD, the corresponding NITS Customer's LaRC must include the resource at the time of the PTP TSR submittal and reference use of PTP transmission for it. The LaRC must continue to contain the resource and use of PTP transmission for it to enable the PTP TR to remain valid. • This Evaluation Criteria is applicable to (F)TSRs in the Transition Study and to (F)TSRs submitted after the deadline to be included in the Transition Study.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop.	• Transition • Future State
10	**Evaluation Criteria: Virtual Hubs in the LTF Transmission Market**	• BPA will remove MIDCRemote from LTF market access. Unstudied (F)TSRs with a POR or POD of MIDCRemote must conform their POR or POD to either NWHUB or Grant/Chelan/Douglas points, otherwise they will be declined and removed from the transmission queue. • This Evaluation Criteria is applicable to (F)TSRs in the Transition Study and to (F)TSRs submitted after the deadline to be included in the Transition Study.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop.	• Transition • Future State
11	**Evaluation Criteria: LTF Transmission for NWHUB**	• (F)TSRs with a POR or POD of NWHUB are not eligible for a physical plan of service that provides a path to long-term firm service and will only be offered long-term Reassessment CFS. • This Evaluation Criteria is applicable to (F)TSRs in the Transition Study and to (F)TSRs submitted after the deadline to be included in the Transition Study.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • BPA would be open to considering other mutually agreeable approaches to offerings of Reassessment CFS at the NWHUB.	• Transition • Future State
12	**Evaluation Criteria: Additional Data if Needed for Planning (beyond OASIS and data exhibit requirements)**	• Modify the tariff to expressly allow BPA to require additional data necessary for transmission planning processes. • Sections 17.2(x) and 29.2(ix) of the tariff would be modified to read "Attachment K and other BPA transmission planning processes."	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop.	• Transition • Future State
13	**Contingent Conditional Firm Service (CFS) Analysis Agreement**	• For each (F)TSR in the transmission queue that has satisfied the data exhibit validation and evaluation criteria required to proceed in the Transition Study, BPA will tender a Contingent Conditional Firm Services (CFS) Analysis Agreement to determine if a LTF offer or an award of CFS can be extended. The Contingent CFS Analysis Agreement will include: 1. The customer's commitment to accept an offer of Reassessment CFS or Bridge CFS, if or when available; 2. Required fees to cover costs of the Contingent CFS Analysis; and	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • GPUD agrees with one addition: item 1 should include an option for the customer to accept continued CFS as part of Markets+ when Markets+ goes live on 10.1.28; customers should be required to indicate in TSRs whether or not they are willing to accept continued CFS after 10.1.28	• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
		3. The customer's security obligation		
14	**Contingent CFS Analysis Agreement - Mandatory**	• The customer is required to execute the Contingent CFS Analysis Agreement to proceed in the Transition Study, otherwise the (F)TSR will be declined and removed from the queue. A signed agreement commits the customer to Bridge CFS or, if only Reassessment CFS is available due to term of less than 5 years, or NWUB POR or POD (including MIDCRemote POR or POD conformed to NWHUB), if and when it is available.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • GPUD agrees with one proviso: BPA should include an option for the customer to accept continued CFS as part of Markets+ when Markets+ goes live on 10.1.28	• Transition
15	**Product Description: Bridge Conditional Firm Service (CFS)**	• Awards of service that include roll-over rights will function like Bridge CFS today - the request will provide the capability for the customer to bridge service needs to long-term firm service in the future state. PTP customers will convert to firm by meeting the requirements of Proactive Planning (future state) and then upon energization of the plan of service following execution of a LTF offer. NITS customers will convert to firm by meeting the requirements of Proactive Planning (future state) and then upon execution of an LTF offer and designate the resource. • Both CFS for PTP and NITS may receive short-term firm ups and through same automated process.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • GPUD agrees with one proviso: item 1 should include an option for the customer to accept continued CFS as part of Markets+ when Markets+ goes live on 10.1.28.	• Transition
16	**Product Offering: Reassessment CFS**	• BPA will offer Reassessment CFS to customers with TSRs that are less than 5 years or ineligible for reservation priority (i.e. do not include roll-over rights) • BPA will offer Reassessment CFS to customers with TSRs with a POR or POD of NWHUB.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • BPA would be open to considering other mutually agreeable approaches to offerings of Reassessment CFS at the NWHUB.	• Transition • Future State

17	**Fees to Cover Costs of the Contingent CFS Analysis**	• As part of the Contingent CFS Analysis Agreement, the customer is required to submit a non-refundable study fee equal to $50,000 plus a deposit equal to $1,000 per MW, subject to actual study cost true-up after 3 years, for additional study costs.	• As part of the Contingent CFS Analysis Agreement, the customer is required to submit a fee equal to $1,500 per MW.
			  ○ Actual analysis and operational constraint mitigation costs will be trued-up to the total fees collected on a pro rata share basis after three years from the commencement of the CFS Analysis, less the 30% non-refundable portion.
			  ○ TSRs withdrawn to meet cumulative demand requirements will have their study fee, less the 30% non-refundable fee, refunded.
				• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
			○ TSRs withdrawn following the CFS Analysis that do not fund the second security will have their study fee, less the 30% non-refundable fee, refunded. • BPA would be open to considering other mutually agreeable fee structures to cover the costs of the Contingent CFS Analysis.	
18	**Steps for Providing Security**	• Not addressed.	• For each (F)TSR, the customer is required to provide security in two "steps" to be eligible for an offer of Bridge or Reassessment CFS, if available: ○ **First Security:** One year of security is required upon executing the Contingent CFS Analysis Agreement. ○ **Second Security:** One more year of security is required within 30 calendar days of receiving the CFS Analysis to support Operationalizing Constraint Management for Awarding CFS. • For both PTP and NITS Customers: ○ The maximum time period security will be held without an offer is 6 years from the date security is provided for Contingent CFS Analysis Agreement ○ Service can continue after the security obligation is met and, if Bridge CFS is awarded, until the commencement of long-term firm service, once a firm offer is tendered, assuming customer meets subsequent requirements. • BPA would be open to considering other mutually agreeable approaches to collecting security.	• Transition
19	**Security: Obligation Release**	• **PTP Reduction:** Security will be reduced on a straight-line basis each year service is taken and paid for, not to exceed 3 years. • **NITS Reduction:** Security will be reduced annually when one (1) month in each of three (3) out of five (5) calendar years the customer's hourly peak metered Facility Load must increase in an amount equal to or greater than 80% of the FTSR's requested amount. For each year the customer meets its metered load obligation, BPA will release or reduce the financial security obligation.	• **PTP:** 1 Year after the PTP customer's commencement of CF service, security will be released in full. • **NITS:** 1 Year after the NITS customer designates the resource in the forecasted amount and the commencement of CF service, security will be released in full, provided the NITS customer has maintained the designated resource for that 1 year.	• Transition
20	**Security: Amount and Duration Required Upon Executing the Contingent CFS Analysis Agreement (prior to analysis)**	• See row #21	• **PTP Customer** ○ **Amount:** 1 year of PTP transmission service on the MWs requested using the PTP transmission rate in effect at the time the Contingent CFS Analysis Agreement is tendered.	• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
			○ **Duration:** In place or effect from the date it is provided or issued through any period of construction, any delay to the service start date, any applicable deferrals, and 1 year following the commencement of service up to a maximum of 6 years from date of execution of the CFS Analysis Agreement. • **<u>NITS Customer</u>** ○ **Amount:** 1 year of NITS transmission service on the MWs requested using the NT transmission rate in effect at the time the Contingent CFS Analysis Agreement is tendered. ○ **Duration:** In place or effective from the date it is provided or issued through any period of construction, any delay of service from forecasted service need date, the DNR process, 1 year following the commencement of service up to a maximum of 6 years from date of execution of the CFS Analysis Agreement. • BPA would be open to considering other mutually agreeable approaches to the amount and/or duration of security required.	
21	**Security: Amount and Duration Required for Operationalizing Constraint Management for Awarding CFS (following the CFS Analysis and prior to developing and implementing constraint management tools)**	• For a Contingent CFS Analysis Agreement that includes an offer of Bridge CFS, the customer is required to provide security. • **<u>For both PTP and NITS Customers:</u>** ○ For Bridge CFS, the request for service must be for a minimum 5 years for ROFR. ○ For Reassessment CFS, the security term must match the duration of the request, up to 3 years. ○ The maximum time period security will be held without an offer is 10 years. ○ Service can continue after the security obligation is met and until the commencement of long-term firm service, once a firm offer is tendered, assuming customer meets subsequent requirements. • **PTP Customer** ○ **Amount:** 3 years of PTP transmission service on the MWs requested using the PTP transmission rate in effect at the time the TSR is placed into QUEUED status on OASIS.	• For a Contingent CFS Analysis Agreement that includes an offer of Bridge CFS, the customer is required to provide security. • **<u>For both PTP and NITS Customers:</u>** ○ The request for Bridge CFS must be for a minimum 5 years for ROFR. ○ If the request is only eligible for Reassessment CFS, the security term must match the duration of the request, up to 2 years (Security Upon Execution of the Contingent CFS Analysis Agreement plus Security for Operationalizing constraint Management for Awarding CFS). • **<u>PTP Customer</u>** ○ **Amount:** 1 year of PTP transmission service on the MWs requested using the PTP transmission rate in effect at the time the Contingent CFS Analysis Agreement is tendered. ○ **Duration:** In place or effect from the date security is provided or issued through any period of construction, any delay to the service start date, any applicable deferrals, and 1 year following the commencement of service (up to a maximum of 6 years from execution of the CFS Analysis Agreement). • **<u>NITS Customer</u>**	• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
		○ **Duration:** Security will be held in place from tendering the Contingent CFS Assessment Agreement, through to the service start date, any applicable deferrals, and during time service is taken and paid for. • **<u>NITS Customer</u>** ○ **Amount:** 3 years of NITS transmission service on the MWs requested using the NT transmission rate in effect at the time the FTSR is placed into QUEUED status on OASIS. ○ **Duration:** In place or effect from the date it is provided or issued through any period of construction, any delay of service from forecasted service need date, the DNR process, and the original term of service requested after commencement of LTF service.	○ **Amount:** 1 year of NITS transmission service on the MWs requested using the NT transmission rate in effect at the time the Contingent CFS Analysis Agreement is tendered. ○ **Duration:** In place or effect from the date it is provided or issued through any period of construction, any delay of service from forecasted service need date, the DNR process, and 1 year following the commencement of service (up to a maximum of 6 years from execution of the CFS Analysis Agreement). • BPA would be open to considering other mutually agreeable approaches to the amount and/or duration of security required.	
22	**Customer Off Ramps and Release of Security Obligation**	• A customer may voluntarily withdraw their (F)TSR at any of the following points during the Transition Study process: ○ Evaluation criteria validation ○ Upon tendering the Contingent CFS Analysis Agreement ○ At any choice point in the future state where the customer does not meet the requirements (BPA or third-party transmission provider), the customer will be offered Reassessment CFS, if available, so that the customer can complete the originally requested terms to meet their security obligation. ○ If the customer has not received a CFS offer within 10 years. ○ BPA determines it is not proceeding with a build necessary to enable LTF. ○ TSRs withdrawn following the CFS analysis to meet cumulative demand requirements will be relieved of their security obligations.	• A customer may voluntarily withdraw their (F)TSR at any of the following points during the Transition Study process: ○ Evaluation Criteria Validation ○ Upon Tendering the Contingent CFS Analysis Agreement ○ **If the customer has not received a CFS offer by October 1st of 2029.** ○ TSRs withdrawn following the CFS analysis to meet cumulative demand requirements will be relieved of their security obligations. ○ BPA will not collect security for a REDIRECT request where service for the parent TSR has commenced, and the customer is taking and paying for service on the parent TSR. ▪ If service on the parent TSR is being deferred, then customer will be required to provide security ○ At any choice point in the Future State where the customer does not meet the requirements (BPA or third-party transmission provider), the customer will be offered Reassessment CFS, if available, if the customer does not want to take Reassessment CFS, the customer can withdraw their TSR and the security will be returned. For example: ▪ If BPA decides not to build one or more projects in a (F)TSR's plan of service, the customer may withdraw the TSR and security will be returned. ▪ If BPA decides to charge an incremental rate for one or more projects in a (F)TSR's plan of service the customer may withdraw the TSR and security will be returned. ○ For requests of less than 5 years with a termination date that occurs within the 6-year timeframe, security will be released when no more than 1 Year of service can be provided prior to termination.	• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
			○ If BPA reassess conditional firm constraints AND changes the CF conditions for the worse, customer can withdraw without forfeiting the remaining security obligation.	
23	**Conditions for BPA Drawing on Security**	• Security is forfeited by the customer to BPA if the customer does not take and pay for 3 years of Bridge Conditional Firm transmission service unless modified or exempted by future policy or proceeding or the 10-year maximum limit.	• If the Customer withdraws their TSR(s) following completion of the CFS Analysis, the customer will forfeit the first 1 year of security to BPA when the Contingent CFS Analysis Agreement was executed. • If the customer fails to provide the Security for Operationalizing Constraint Management when required by BPA, the customer will forfeit the first 1 year of security to BPA. • All security is forfeited by the Customer to BPA: ○ When a TSR is withdrawn prior to meeting its service obligation unless withdrawn for one of the agreed to conditions for the release from the security obligation. ○ If the customer does not take and pay for 1 year of Bridge CFS unless modified or exempted by future policy or proceeding or the 6-year maximum limit is reached. ○ If the Customer does not take and pay for the requested term of Reassessment CFS up to 1 year unless modified or exempted by future policy or proceeding or the 6-year maximum limit is reached. ○ If the Customer fails to take any required actions that causes the TSR to be removed from the queue.	• Transition
24	**CFS Analysis**	• The CFS Analysis will: ○ Identify constraints, but not a plan of service until a commercial study in Proactive Planning (future state). ○ Identify whether/how/when the constraints can be managed. ○ All offers will be "systems conditions" rather than "number of hours". • Components of the CFS Analysis: ○ Identify constraints ○ Identify available paths or mitigations needed	• The only substantive change from staff leaning is collecting security in two parts. • Components of “Phase 1” of the CFS Analysis: ○ Identify constraints ○ Provide "close out" type letter to customer with constraints: ▪ Develop responses for each (F)TSR: Award of LTF, Award of CFS or CFS Not Awardable currently. ▪ Provide list of constraints currently preventing an award of service. ▪ Collect second security (30 days)	• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
		○ Identify system limits needed to manage the paths ○ Apply the constraints, paths or required mitigations, and system limits to manage the path to the eligible (F)TSRs remaining in the queue. ○ Develop responses for each (F)TSR: Award of CFS or Not Awardable at this time. • NOTE: The CFS Analysis will not develop a plan of service.	○ Customer workshop to describe the constraints. • Components of "Phase 2" of the CFS Analysis: ○ Identify available paths or mitigations needed. ○ Identify system limits needed to manage the paths. ○ Apply the constraints, paths or required mitigations, and system limits to manage the path to the eligible (F)TSRs remaining in the queue. ○ Iterations of service awards, if or when available. ○ Customer workshops to provide transparency during path development. GPUD recommends that during the transition phase to Proactive Planning, BPA should (a) incorporate offers of redispatch of non-federal resources in the Plan of Service, (b) give priority to TSRs that include such redispatch, and (c) merge all redispatch into Markets+ on 10.1.28; otherwise, GPUD agrees with the Settlement Proposal.	
25	**Timing of CFS Award**	• To receive a CFS Award the start date must be within 18 months. • Awards of CFS will be made in an iterative process based on operational management and service commencement. • BPA will revisit paths that were previously ineligible to find areas where increased risk may be acceptable. • NOTE: Not all TSRs will receive an award of CFS due to inability to remove obstacles to reliably provide CFS.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. • BPA would be open to considering other viable approaches to the timing of CFS awards. GPUD recommends BPA explicitly state that offers of CFS that are ready to be made will be held and not tendered to the customer before the beginning of the 18-month window immediately prior to the start date for service	• Transition
26	**Partial and Mid-Term Offers**	• BPA may allow mid-term offers of Reassessment CFS without sub grid: ○ Requirements ▪ Service Commencement Date must be less than or equal to 18 months ▪ Service offer duration must be no more than 24 months ▪ Offer cannot be made with RoFR rights ▪ Newpoint is ineligible ▪ 1:1 ATC would have to be available if required ○ Upon request	• No change from BPA staff leaning shared at Mar. 18-19 TC-27 Workshop.	• Transition

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
		▪ TSRs with RoFR consideration could receive a Reassessment CFS Offer and would be able to submit a remainder request that would continue to hold out for RoFR.		
27	**Cumulative Demand Policy (Requests in excess of Resource Nameplate)**	• Following the CFS Analysis, requests eligible for CFS will be required to make their cumulative demand selections. BPA will only authorize CFS in the contingent offer up to the maximum cited capability of the resource. • Customers are obligated to withdraw the remaining offers (or BPA will decline them). • Customers, with requests from the identified resource that are eligible for CFS and do not make the cumulative demand election following the assessment will be removed from the queue.	• Same as staff leaning shared at Mar. 18-19 TC-27 Workshop except: • Requests from parties unaffiliated with the Generator Owner count towards the cumulative demand quantities and will be subject to the same requirements as transmission service requests from the Generator Owner.	• Transition
28	**RAS Resource**	• If, during the CFS Analysis, BPA identifies RAS requirements for a resource outside of the BPA BAA are needed for CFS, the customer is required to provide the RAS resource and implement RAS capability for the (F)TSR to receive the CFS offer, if available. • If BPA does not identify RAS requirements for a resource outside of the BPA BAA during the CFS Analysis, the customer is not required to provide the RAS resource to receive the CFS offer; however, BPA may identify and require RAS for LTF service.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop.	• Transition
29	**Deferral (17.7 Extension of Service Period)**	• If, after completion of the CFS Analysis, BPA extends an offer of CFS, the customer may elect to defer service 1 time, up to 1 year.	• If, after completion of the CFS Analysis, BPA extends an offer of CFS, the customer may elect to defer service 2 times, up to 1 year. GPUD recommends that during Transition Period (before Proactive Planning), BPA consider removing deferrals to simplify queue management. Priority to TSRs with fully executed power supply contracts that have contractually guaranteed start dates is compatible with removal of deferrals.	• Transition
30	**Individual Studies**	• Requests for individual studies of (F)TSRs on BPA's network will be unavailable until the completion of the first commercial study following the implementation of Proactive Planning.	• No change from staff leaning shared at Mar. 18-19 TC-27 Workshop. GPUD recommends BPA clarify “individual study” and how that differs from other TSRs; this will likely support the Settlement Proposal to simplify queue management.	• Transition

Confidential Settlement Communication
GPUD REDLINES TO BPA Initial Settlement Proposal
Version: May 15th, 2026

#	Grid Access Transformation (GAT) Transition Topic	BPA Staff Leaning (Shared Mar. 18-19)	Initial Settlement Proposal	Applicability
31	**Other Commitments**		• BPA would be open to considering commitments related to the timeline for development and implementation of Grid Access Transformation (GAT) Future State. GPUD requests that BPA commit to processing De Minimis redirect requests on or before July 1st 2026, and that implementation of GAT Future State (Proactive Planning) should occur no later than 10.1.28, or when Markets+ goes live for BPA. GPUD supports SCL's request that BPA commit to modeling and studying all 100kV and above transmission facilities in their proactive planning studies, and requests BPA to commit to having standardized processes and business practices in place to facilitate customer build options by June 1st of 2027.	

Grant County
PUBLIC UTILITY DISTRICT
Excellence in Service and Leadership

January 16, 2026

Bonneville Power Administration
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Portland, OR 97293-4428

Submitted: techforum@bpa.gov

BPA Staff & Grid Access Transformation Team,

Grant County PUD appreciates the opportunity to submit formal comments on the Commercial Business Model (CBM) matrix prepared by BPA for workshops in December 2025 and January 2026. Attached to this narrative is the matrix with Grant's recommendations for near-term transitional changes in BPA's CBM and preferences regarding changes in the TC-27 process, aimed at allowing BPA to process Transmission Service Requests (TSR) in a timely manner and manage the queue for long-term transmission service. This narrative provides an explanation of Grant's basic interests and objectives in forming the recommendations.

Two factors underlie Grant's recommendations. **First**, Grant has executed a Provider of Choice (POC) power purchase agreement (PPA) with BPA, providing for delivery of a Slice/Block of federal power starting October 1, 2028, for which Grant does not yet hold transmission rights. BPA's one-customer/one-product/one-contract policy also means that Grant requires new load-following transmission rights to deliver power from the Grant Balancing Area to Grant's retail loads in Grand Coulee, Washington. Grant currently does not hold the transmission service rights required to support the transition to the POC contract period, and requests that BPA recognize its obligations under federal law (e.g., §837e of the *Pacific Northwest Consumer Power Preference Act*) to provide new long-term transmission service to Grant beginning on October 1, 2028. This obligation extends beyond the power supply itself to include providing transmission service consistent with BPA's unique federal status and FERC's principles of non-discriminatory transmission access**.** During the workshop on January 15, 2026, BPA staff suggested that Interim Service (both NITS and PTP) could be provided when a modified Open Access Transmission Tariff is effective, projected for October 1, 2026. Given the new POC contract, the new non-federal power supplies for Grand Coulee, and multiple dependent decisions by Grant and BPA regarding managing load growth and state carbon mandates, Grant asks BPA for a commitment to offer Interim Service as soon as possible after October 1, 2026. Grant is seeking assurance that the required Agreements for Interim PTP and NITS Service, effective October 1, 2028, will be executed in early 2027.

Second, based on (a) the TC-27 workshops and (b) Grant's and BPA's recent decisions regarding joining the Southwest Power Pool's Markets+ day-ahead market, Grant is interested in offering to BPA the redispatch of certain non-federal power resources of Grant as tools to help BPA manage congestion on the federal transmission system. Redispatch of non-federal

resources, with appropriate compensation, may be helpful to BPA in managing both Main Grid congestion and Sub-Grid limitations. Redispatch may be less costly than construction of new transmission facilities and may be available much sooner than new infrastructure. Redispatch may offer solutions that completely avoid or significantly defer large capital projects and may help BPA find solutions in transmission planning studies that allow transmission capacity to be offered to other customers, not just Grant. Grant also expects non-federal redispatch to help implement Markets+, which Grant and BPA have both committed to join by October 1, 2028. In combination with other actions, a redispatch agreement between Grant and BPA may enable a more rapid clearing of or reduction in the size of the queue that BPA faces and could also lead to similar solutions being enabled in other circumstances. Grant understands that redispatch of non-federal power is not currently a tool for managing power supplies, for various reasons, but believes that the Northwest can learn from the experience of other parts of the country in this regard and move forward to more efficient queue management based on more robust redispatch efforts. Given that redispatch of non-federal power could act as a substitute for building more transmission capacity, Grant concludes that non-federal redispatch should become a regular consideration in all studies of TSRs, no matter the type, duration, or location of such requests.

Although there are many details to work out, to help manage the current TSR queue and start the transition to the future state for transmission planning, Grant endorses the proposal outlined by Seattle City Light on January 15 for (a) starting the shift to Proactive Planning now, (b) reassigning internal resources to the Proactive Planning efforts and (c) offering Interim Service (i.e., Conditional Firm PTP and NITS) to all TSRs and FTSRs while also implementing LTF Queue Management based on Customer Choice. Such offers of Interim Service would be "mandatory" and based on Customer Choice, i.e., "if offered, either accepted as is or rejected", and would have other terms and conditions necessary to enable transmission planning and expansion in the long run. Mandatory Interim Service will create more pressure on BPA's existing operational management systems, which will need to be expanded, including but not limited to non-federal redispatch. Grant's understanding is that BPA is interested in expanding its toolkit to include the redispatch of non-federal power and more load management. Grant strongly supports studies, contracting and investments in both areas, and looks forward to working with BPA on the redispatch of Grant's non-federal resources to the benefit of both parties and to other BPA customers.

Thank you for the opportunity to provide these comments. Grant looks forward to collaborating with BPA to develop practical solutions that enhance system efficiency, reduce costs, and support regional market integration.

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Grant County
PUBLIC UTILITY DISTRICT

Powering Our Way of Life.

October 21st, 2025

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

Subject: Request for Background Information to Inform TC-27 and GAT Discussions

BPA Staff & Grid Access Transformation Team,

Grant PUD supports PPC's recent request for timely and comprehensive background information from BPA to inform the upcoming TC-27 and Grid Access Transformation (GAT) discussions. As transmission plays a critical role in ensuring reliable and affordable service to our communities, it is essential that stakeholders have a shared understanding of BPA's statutory obligations, planning processes, and strategic direction.

Providing the requested materials in advance of the October workshops will foster more productive dialogue and help ensure that the limited time available is used effectively. We echo PPC's call for transparency, responsiveness, and collaboration as BPA navigates this period of significant industry change.

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