



May 6, 2026

VIA ELECTRONIC FILING

Abbey Nulph
Project Manager, GAT
Bonneville Power Administration

Re: Joint Oregon PUC and Washington UTC Comments Regarding BPA TC-27 Tariff Proceeding

Dear Abbey Nulph,

The Washington Utilities and Transportation Commission and Oregon Public Utility Commission (Commissions) write in response to the Staff Leanings published by the Bonneville Power Administration (Bonneville) staff as a part of the March 18th and 19th TC-27 Pre-Proceeding Workshop.

The Commissions wish to express general support for the Staff Leanings published by Bonneville staff. Broadly speaking, the Staff Leanings demonstrate Bonneville's work improving queue management and offering Conditional Firm Service (CFS) to generation projects ready to use it. Such efforts will allow for faster connection of generation to Bonneville's transmission system. Additional generation on the system will help to serve increasing demands from the systems, add to energy security, and provide a continued foundation for economic development in the Pacific Northwest.

Bonneville's offering of CFS helps reform the transmission service request process. Managed well, CFS can bridge the gap between the status quo and firm service, allowing more energy to flow onto the existing grid. The Commissions believe that the increased utilization of existing infrastructure creates outcomes that will benefit ratepayers in both Washington and Oregon. We support your efforts to maximize the use of the existing grid for the benefit of all stakeholders. As Bonneville increases its CFS offerings, the Commissions encourage transparency by sharing additional data related to the utilization of Bonneville's grid system and curtailment rates for CFS customers.

The Commissions are also encouraged by the Staff Leanings presented by Bonneville related to queue management. The Bonneville Staff Leanings identify sensible approaches to solving the backlog of requests, including applying evaluation criteria to the existing queue, consideration of source maturity, and resuming the processing of *de minimis* transmission service requests. Bonneville's Staff Leanings show a thoughtful process for queue management to transition from the present day to the Grid Access Transformation Future State model.


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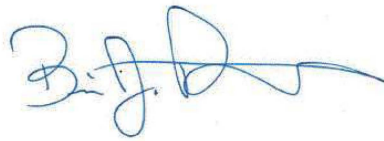
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The Commissions maintain their previous positions submitted to Bonneville in joint comments. The current state of the Transmission Service Request queue is unsustainable. The region requires solutions that create a queue that Bonneville can study and manage in order to serve the public interest in the Northwest. Bonneville's efforts to remove delays from the queue helps achieve that goal. The Commissions continue to welcome process changes that will allow Bonneville, utilities, project developers, and other affected entities to deliver on affordability, reliability, and state policy.

Respectfully submitted,



Letha Tawney
Chair, Oregon Public Utility Commission



Brian J. Rybarik
Chair, WA Utilities and Transportation
Commission



Les Perkins
Commissioner, Oregon Public Utility
Commission



Ann E. Rendahl
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