

April 10, 2026

To: [techforum@bpa.gov](mailto:techforum@bpa.gov)

Re: PacifiCorp Comments related to BPA's TC-27 Pre-Proceeding Workshop March 18-19, 2026

## **Introduction**

In response to the material presented by BPA during the Pre-Proceeding Workshops held on March 18 and 19, 2026, PacifiCorp provides here general and issue-specific comments for BPA's consideration. PacifiCorp appreciates that BPA has recognized the needs of customers and the region to move off pause and begin processing its Transmission Service Request ("TSR") queue as soon as possible. PacifiCorp also appreciates that BPA has identified items to support this need, along with the transition to BPA's future-state process that is outside the scope of TC-27 as part of the Grid Access Transformation (GAT) initiative. PacifiCorp emphasizes the importance of the need to move off the pause in the TSR queue in order to obtain certainty in resource planning, a point that is of great importance to PacifiCorp and many of our state regulatory commissions.

As stated previously, BPA plays a critical role in the Northwest as an operator of critical transmission pathways. PacifiCorp and other utilities in the region depend on BPA to manage, plan, and develop needed transmission pathways to enable the utilities to meet carbon compliance programs in Oregon and Washington, as well as support customer load growth in the region. Oregon House Bill 2021 mandates that large investor-owned utilities decarbonize their retail electricity sales in Oregon by 2040, including interim emissions reduction targets of 80 percent and 90 percent below baseline emissions level by 2030 and 2035, respectively. Similarly, Washington's Clean Energy Transformation Act mandates that electric utilities' Washington retail electricity sales achieve greenhouse gas neutrality by 2030, and that 100% of all such sales come from non-emitting or renewable resources by 2045. In addition, Washington's Climate Commitment Act requires electric utilities to submit allowances to cover reported greenhouse gas emissions. BPA's current TSR queue pause impacts the ability of regional utilities to plan for, and meet, these requirements. PacifiCorp was encouraged to hear BPA acknowledge they heard and understood this critical need in the March 18 and 19 workshops.

PacifiCorp remains concerned that some of BPA's proposals lack sufficient detail, creating uncertainty as to how the proposal would move BPA towards moving off pause and processing its TSR queue. Further, PacifiCorp is concerned about how and when the identified proposals will be implemented so that the process of moving off pause can begin. The BPA TSR queue has been on pause since February of 2025 with no clear timeline for when requests will be restarted. PacifiCorp's comments herein raise two specific issues with the initial Staff leanings shared during the March 18 and 19 workshops. PacifiCorp requests that BPA consider these comments as it develops its settlement proposal in this proceeding. PacifiCorp notes that it reserves its rights to raise issues with other components of BPA's proposal in future comments.

## **PacifiCorp Comments on Staff Leanings Presented During the March 18 and 19 Workshops**

### **Issue #1: Evaluation Criteria**

BPA has proposed to apply new evaluation criteria to requests in its TSR queue. During the March 18 and 19 Workshops, BPA discussed different evaluation criteria it would implement, including changes to Virtual Hubs. PacifiCorp requests that BPA provide additional information regarding its proposal to remove MIDCRemote and conform to NWHUB. PacifiCorp does not understand how BPA's proposal would support BPA's overall queue management initiative or assist in moving the queue off pause. PacifiCorp requests additional justification from BPA regarding this change.

### **Issue #2: Interim Service**

BPA has proposed to award Conditional Firm Service to act as a bridge until BPA fully implements and executes on its GAT Future State model. As part of this proposal for interim service, BPA proposed during the March 18 and 19 Workshops to require a customer to execute a "Contingent CFS Analysis Agreement" that would commit the customer to taking Conditional Firm Service if BPA is able to award it, with the timing of such service to be offered at the discretion of BPA. The customer would be required to pay \$1,000/MW for study costs at the time of execution, along with a non-refundable \$50,000 Conditional Firm Service analysis fee. PacifiCorp requests that BPA provide additional information as to why these fees are appropriate, especially given the lack of clarity regarding whether Conditional Firm Service will be offered in the future. Further, PacifiCorp is concerned that customers may be required to pay considerable fees up-front, without any guarantee of if and when a customer will receive Conditional Firm Service.

PacifiCorp appreciates the opportunity to comment on these proposals. BPA has announced that it anticipates beginning settlement discussions in TC-27 in the hope that settlement would expedite completion ahead of completing a regular tariff proceeding. PacifiCorp supports the commencement of settlement discussions that may facilitate BPA's ability to offer service and move off pause as soon as possible.

Tony Worthington  
Federal Transmission Manager  
PacifiCorp

**TC-27 Pre-Proceeding Workshop Presentation**  
**March 18-19, 2026**

**TC-27 Alternatives Selection  
March 18-19, 2026**

**TC-27 Pre-Proceeding Workshop Presentation**  
**March 18-19, 2026**



# TC-27 Pre-Proceeding Workshop

March 18-19, 2026



# Agenda

- Workshop Norms Reminder
- Grid Access Transformation Planning Program Transition (Steps 5 & 6: Feedback and Staff Proposal)
  - Transition Business Model
  - Evaluation Criteria
  - Queue Management
  - Transition Studies
  - Interim Service
  - NITS Forecasts
- Other Items
- Next Steps

# Workshop Norms

- Participants are encouraged to speak respectfully, be mindful of the limited time for discussions, and allow other participants and BPA staff to share their feedback.
- Participants are required to use the “raise hand” feature and chat in Webex to provide comments.
- Participants are encouraged to limit their speaking time to 3 minutes per topic.
- BPA will facilitate the conversation to ensure all participants have the opportunity to provide their input in a timely manner.
- Participants will refrain from discussing prior positions or comments submitted by other participants.

# Problem Statement

(shared during Oct. 28 TC-27 pre-proceeding workshop)

- BPA's current means of processing its rapidly growing transmission service request queue no longer leads to solutions that support the region's economic needs.
- An actionable 60+ GW study of BPA's transmission system is not currently possible due to:
  - Having many TSRs with insufficient data to accurately define a plan of service and/or assess capability for Conditional Firm Service; and
  - Unintended consequences of modeling unrealistic load increases or unrealistic generation dispatch patterns to achieve load/resource balance necessary to perform a power flow study; or
  - Inability, using BPA's current processes, to conduct scenario analysis on the scale required to reflect generation dispatch uncertainty; or
  - 7-8 years required to batch TSRs into smaller MW studies.

# Scope of TC-27

## Evaluation Criteria (TC-27)

Requirements to submit a completed application

## Interim Service (TC-27)

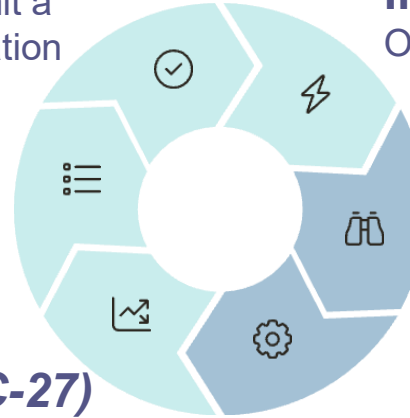
Offer earlier access with informed risk

## LTF Queue Management (TC-27)

Activating what can move forward

## NITS Forecasts (TC-27)

Anchored in customers' own forecasts, for which they are accountable



## **Future State**

### **Proactive Planning**

Move ahead of requests

### **Accelerate Expansion**

Restructure plan, design, and build processes to meet regional urgency

# Objectives for Transition

- “Get off pause” through the following actions:
  - Process LaRCs and provide outcomes of LaRC evaluation to customers.
  - Evaluate TSRs and award service if available, including requests with *de minimis* impacts.
  - Conduct a transition study to identify any additional system constraints necessary to enable CFS offers.
- Develop a queue of unstudied long-term transmission service requests (TSRs):
  - With sufficient detail to identify impact(s) to the transmission system, if awarded, and transmission system upgrades necessary to award long-term firm service;
  - Reflective of customer needs;
  - Ready to be awarded transmission service commencing within the next four years; and
  - Small enough to be studied within one or possibly two study cycles/batches.
- Award CFS only when BPA can ensure effective congestion management without degrading quality of service for existing long-term firm transmission rights.
- Stand up a transition process to provide CFS until BPA fully implements and executes on the GAT Future State model.



# Transition Business Model



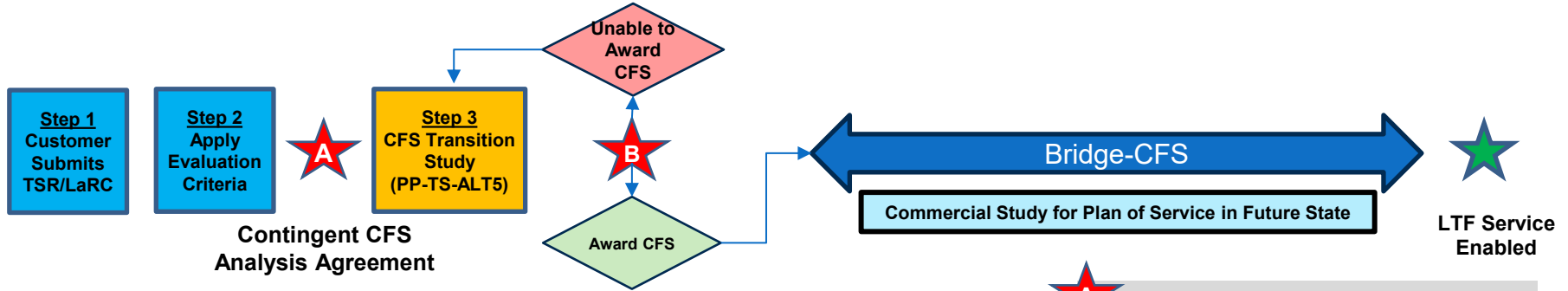
# Introduction

- What is the TSR transition business model
  - The process under which BPA responds to eligible long-term firm PTP service requests and NITS forecasts on BPA's network prior to implementation of Proactive Planning and future state commercial studies.
  - It is the step to enable conditional firm service, if available, prior to a study for a complete plan of service.
  - It includes:
    - Eligibility, evaluation, and analysis and service requirements
    - Contractual commitments and obligations
    - Fees and security

# What We Heard in Comments

- Service to the most ready so the region can meet the nearer-term regional needs.
  - **NT Customer Group**
    - “Adopted policies must ensure that BPA does not needlessly encumber transmission capacity for transmission customers that are unable, unwilling, or unready to receive service. Failure to do so impairs BPA’s ability to meaningfully meet its tariff obligation to plan for the forecasted load and resources of its NITS customers, and may likely cause an overbuilding of its transmission system.”
- Move to the future state as soon as possible.
  - **NT Customer Group**
    - “Selected alternatives must prioritize efforts to implement Proactive Planning and minimize the duration of any necessary transition phase.”
- Customers overwhelmingly want offers of service as fast as possible.
  - **Obsidian**
    - “Issuing conditional firm transmission effectively puts the decision to move forward quickly on the transmission customers and their partners, with accompanying financial responsibility.”
- The existing queue should be processed in an OATT compliant manner adhering to queue order principles.
  - **NIPPC and RNW**
    - “Respecting the Federal Energy Regulatory Commission’s non-discriminatory open access principles while acknowledging that some deviations may be necessary in the near term to resolve the massive queue backlog and meet the region’s needs.”

# LTF Tx Queue Transition Steps



**Step 1: Customer Submittal**

- QM-ECQ-D14-ALT1: Keep Existing Queue
- QM-HNS-D17-ALT2: Study for POS in Future State (can submit and be studied for CFS until changeover date to future state study)
- Processing Fee and (F)TSR Deposit
- Non-Trended Load Growth

**Step 3: CFS Transition Study**

PP-TS-ALT-5: Study to Resolve Interim Service Ineligibility

Eligibility for Transition:

- EC-SM-ALT1: Cited Resource online or in Late Stage or Bypass of GI process
- Meet all Evaluation Criteria Requirements

**Step 2: Apply Evaluation Criteria**

QM-CEC-Alt1: Use Existing DE validation forms, Process, and cure periods

Applied as follows:

- EC-SM-ALT1: Cited Resource online or in Late Stage or Bypass of GI process – opportunity to cure
- All other Evaluation – opportunity to cure
- After established date, EC-SM-ATL-5 Execution of Phase Two Cluster Agreement

**Future State:** Awarded and Not Awarded (F)TSRs eligible for next commercial study for a complete plan of service. LTF Service enabled when all projects in a plan of service are commercially operational, the resource is on-line, the load is there to be served, and all third-party impacts have been mitigated.

**A** **Contingent CFS Analysis Agreement**

One Package that contains:

- Analysis Agreement and Fees
- Security Requirements
- Commitment for CFS, if or when available (Reassessment or Bridge)

**B** **Award CFS**

- IS-PO-ALT-5a: PTP and NITS B-CFS
- IS-MV-ALT1 – Mandatory Authorization otherwise TSR will be declined on OASIS and receive no further consideration for LTF service.
- One Deferral for up to one year

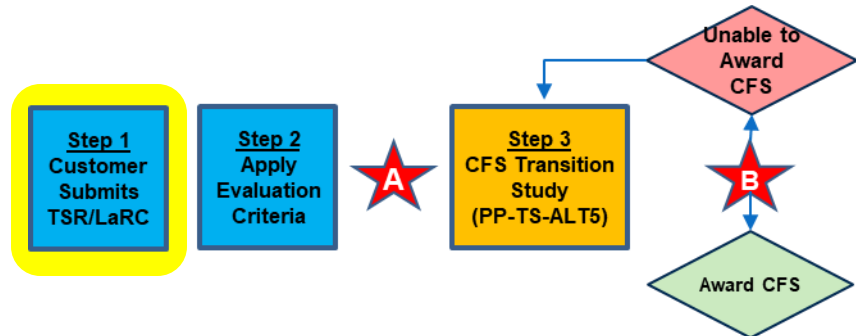
**Unable to Award**

- As conditions change BPA will reanalyze
- Must meet On Going Evaluation Criteria Requirement



# Step 1

## Customer Submits TSR/LaRC



# Step 1

- Application/Collection of TSR Fees
  - Non-Refundable TSR Processing Fee
  - TSR Deposit
- Non-Trended Load Growth

# What we Heard in Comments

- Customers support BPA applying a threshold on a per facility basis.
  - “We support and appreciate BPA’s proposal to apply the threshold on a per-facility basis,” NRU.
  - “To date, the only policy language is in presentation materials, and the NLSL Group believes that clear policy language needs to be developed that captures the rationale for developing this policy,” NLSL Group.
- Customers support moving the Non-Trended Load Growth threshold from 13 MW to 20 MW per facility.
  - “NRU urges BPA to consider adjusting its Large Load Facility staff leaning from a threshold of 13 MW to a minimum of 20 MW...NRU encourages it to at least align its planning thresholds across its various transmission services: Generator Interconnection, transmission network, and Line & Load Interconnection,” NRU.
  - Columbia River PUD and the NLSL Group also supported NRU’s proposal to move the Non-Trended Load Growth threshold from 13 MW to 20 MW.

# What we Heard in Comments

- NITS customers support starting to processing LaRCs that are below the Non-Trended Load Growth threshold as soon as possible.
  - **NT Customer Group**
    - “BPA must move as quickly as possible to restart BPA’s processing of the load and resource forecasts of its NITS customers.”
- Customers do not support the application of the Large Load Facility policy to a facility on an indefinite basis.
  - **PNGC**
    - “PNGC Power strongly opposes a ‘once a NLL, always a NLL’ designation.”
- Non-Trended Load Growth determinations should sunset in the “Future State.”
  - **AWEC**
    - “New large load designations (now LLF designations) should sunset in the future state.”

# Trended and Non-Trended Load Growth Threshold

- Due to the changing industry terminology BPA has decided to utilize the terms “trended” and “non-trended” load growth to define the proposed line that will be applied to NITS forecasts.

# Non-Trended Load Growth Threshold on per facility basis

- **Staff Leaning**

- BPA maintains the Non-Trended Load Growth threshold will be per facility.

- Customers are asking for more written details on the proposed policy that are not in a presentation format. BPA agrees and will be working to draft the relevant Business Practice language to provide more detail.

# Moving from 13 MW to 20 MW

- **Staff Leaning**

- BPA maintains a 13 MW threshold is appropriate for a commercial evaluation.

- **Rationale**

- Moving the line from 13 MW to 20 MW without commercial planning creates more reliability risk than BPA feels is appropriate at this time.
- Only commercial planning evaluates resources to load.
- Interconnection and transmission service serve different functions, and utilizing different thresholds between interconnection and transmission service is appropriate.

# Permanence of Non-Trended Load Growth Threshold

- **Staff Leaning**

- If commercial planning has granted a firm encumbrance (the plan of service is energized if applicable) and the customer has designated the associated resource, application of the NTLG threshold will start again.

- **Rationale**

- If a transmission plan of service is necessary to grant firm service, once the plan of service is energized the necessity to evaluate trended load growth at previously identified facilities should decrease.

# Non-Trended Load Growth Threshold sunset in Future State

- **Staff Leaning**

- BPA will not have a sunset clause on the NTLG policy.

- **Rationale**

- As BPA reviews LaRC requests for commercial evaluation, if capacity is available the request will be encumbered and not require a commercial study or a plan of service. As BPA accelerates transmission builds in the Future State, more customers will be encumbered for and fewer will require a commercial study. There is no firm timeline on when different parts of the main grid transmission system will become unconstrained though.

# Processing LaRCs in the Transition

- **Staff Leaning**

- BPA will begin providing LaRC evaluation\* communications to the customer once the relevant Business Practice is updated to reflect the Non-Trended Load Growth (NTLG) threshold.
  - Customers forecasting FCRPS that are below the NTLG threshold will receive a communication that no commercial planning is necessary.
  - Customers forecasting FCRPS that are above the NTLG threshold will receive a communication with the FTSR number. Assuming any data exhibit requirements are met, at the conclusion of TC-27 the customer will have the option to participate in an upcoming study if necessary.
  - Customers forecasting non-federal resources will receive a communication with the FTSR number. Assuming any data exhibit requirements are met, at the conclusion of TC-27 the customer will have the option to participate in an upcoming study if necessary.

- **Rationale**

- Staff believes this approach best meets customers' and BPA's needs.

\*During the transition stage BPA will evaluate LaRCs and apply the NTLG threshold to LaRCs received 8/15/24 12:01pm through the most recently received LaRC.

## Contracted For Committed To (CFCT) Loads

- BPA has determined that CFCT loads will not be exempt from the NTLG threshold policy.
  - As a NITS customer provides their LaRC, BPA will evaluate their loads and apply the NTLG policy to any facility growth, including CFCTs, identified in the LaRC forecast.
- **Rationale**
  - CFCT loads are offered a different power rate but still require power and transmission planning when increasing their forecasts.

# Commercial Planning for Resources

- The commercial evaluation is necessary to determine if a study is required.
- Only commercial planning evaluates resources to load.
- When is a commercial evaluation required for customer resource forecasts:
  - Forecast of a new or increased non-federal resource\*
  - Designation of a non-federal resource for which capacity has not been encumbered.

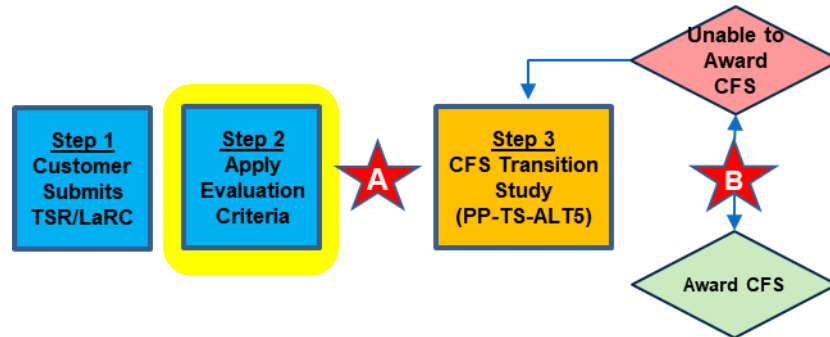
\*No change from current and past practice for treatment of non-federal resources. It's possible that non-federal resources serving load below the NTLG threshold require a commercial evaluation.

## **Behind the Meter Resources, Co-Located Loads/Resources, and Associated Charges**

- Behind the meter resources, co-located loads/resources, and associated charges are out of scope for TC-27.
- BPA is monitoring FERC policy development.



# Step 2 Apply Evaluation Criteria (EC)



# What we heard in Queue Management comments

- Service to the most ready so the region can meet the nearer term regional needs.
  - **NewSun Energy**
    - “...agrees that meeting regional... requirements is a core goal and doing so sooner rather than later is preferable to ensure that projects can be financed and the region can capitalize on expiring tax credits.”
- Move to the future state as soon as possible.
  - **Seattle City Light**
    - “We believe the Future State is the lowest cost route for the region and our customers.”
- The existing queue should be processed in an OATT compliant manner adhering to queue order principles.
  - **Powerex**
    - “Powerex encourages solutions that build on existing tariff structures—including the pro-forma OATT—and established processes where practicable, while allowing for targeted changes where needed to support efficient queue processing as well as durable and beneficial transmission outcomes.”
- Solutions should be Implementable as quickly as possible
  - **NIPPC and RNW**
    - “Preference for the option that BPA can implement most quickly and efficiently.”

# Staff Leaning: Applying Evaluation Criteria to the Queue (QM-ECQ) and Collecting New Evaluation Criteria (QM-CEC)

## Alternatives

### QM-ECQ (Apply EC to the queue)

- **QM-ECQ-ALT-1:** Keep existing queue.
- **QM-ECQ-ALT-2:** Empty existing queue.
- **QM-ECQ-ALT-3:** Apply the new requirements through an agreement.



**Customer Support:** QM-ECQ (Apply EC to the queue)

- **QM-ECQ-ALT-1: Keep existing queue.**



**Staff Leanings:** QM-ECQ (Apply EC to the queue)

- **QM-ECQ-ALT-1: Keep existing queue.**

## Alternatives

### QM-CEC (Collecting new EC)

- **QM-CEC-ALT-1:** Start where we are.
- **QM-CEC-ALT-2:** Customers submit a new data form.
- **QM-CEC-ALT-3:** Combine ALT-1 and ALT-2



**Customer Support:** QM-CEC (Collecting new EC)

- **QM-CEC-ALT-1: Start where we are.**
- QM-CEC-ALT-3: Combine ALT-1 and ALT-2



**Staff Leanings:** QM-CEC (Collecting new EC)

- **QM-CEC-ALT-1: Start where we are.**

# Applying Evaluation Criteria to the Queue (QM-ECQ): Staff Leaning

- **Staff Leaning**

- Keep Existing Queue QM-ECQ-ALT-1: apply the evaluation criteria to existing requests in the existing queue.

- **Rationale**

- Supported by Customers
- Customers start transition with their current queue positions
- Minimize redundant work for both BPA and customers.
- Establish the CFS analysis queue as quickly and efficiently as possible.

# Collecting New Evaluation Criteria (QM-CEC)

- Start where we are QM-CEC-ALT-1: Use existing data exhibit validation form, cure process, and cure timelines.
- Customer Support - QM-CEC-ALT-3: Combination of ALT-1 + ALT-2\*
- **Rationale**
  - Validation work can start immediately following evaluation criteria adoption in TC-27.
  - The current data exhibit form provides BPA with the ability to collect the evaluation criteria without any changes.
  - The current process for validating evaluation criteria is already developed and in use with defined cure periods.
  - Source Maturity of EC-SM-ALT-1: Online, Late Stage, and Bypass is verifiable with internal information.

*\*Alt 2 included the development of a new data exhibit validation form for submission of any changed requirements.*

# Evaluation Criteria Principles

## Previously shared principles:

- Define/Receive “Studiability” (F)TSRs (i.e., each (F)TSR provides high-quality data that supports ability to study accurately)
  - Data Requirements established in TC-27 will apply both in the transition period and become the foundation for the future state unless otherwise indicated.
- Determine manageability for CFS
  - Focus on interim CFS service for nearer-term customer needs in the transition period.
- BPA needs information beyond that required on OASIS to enter a (F)TSR into the queue to support its efforts to process long-term firm transmission service requests.
  - Provide BPA with information necessary to manage the interim transmission service challenges in today’s environment.

# Supportive Customer Comments on Evaluation Criteria

- **Brookfield Renewables**
  - “...believes it is imperative that BPA let commercially viable and ready projects and transmission requests proceed.”
- **NIPPC/RNW**
  - “[Ensure] that BPA has the ability to develop plans of service by requiring customers to meet stricter evaluation criteria in submitting TSRs, while also providing mechanisms for marketers and traders to submit valid requests...”
- **PacifiCorp**
  - “...believes BPA is in the best position to determine what requirements are needed from customers to ensure that BPA receives mature, ready-for service requests.”
- **PGE**
  - “...encourages BPA to prioritize transmission service requests that are demonstrably ready to move forward, where buyers and sellers have executed or are prepared to execute agreements...”
- **Powerex**
  - “...generally supports BPA implementing an appropriate level of evaluation criteria to better manage the Transmission Service Requests (‘TSRs’) and Forecasted Network Resource TSRs (‘FTSRs’) queue and obtain the information needed to effectively study pending requests.”
- **PPC**
  - “...interested in working with BPA and other customers to develop evaluation criteria that will best enable customers to receive service in a timely manner. Any evaluation criteria adopted will need to balance the need that BPA has for information to accurately study requests and the need that customers may have for some level of flexibility in the use of the system.”
- **Snohomish**
  - “BPA should apply data exhibit validation strictly to eliminate speculative TSRs.”
- **WUTC/OPUC**
  - “...agree that a long-term solution to create a study-able queue is critical.”

# Concerned Comments on Evaluation Criteria

- **Dynasty Power**
  - "...we strongly encourage BPA to preserve continuity and avoid significant changes to business practices as they relate to existing Transmission Service Requests (TSRs) currently in the queue."
  - "With respect to readiness criteria, Dynasty notes potential risks associated with adopting overly discretionary project evaluation frameworks, as illustrated by developments in other jurisdictions."
- **Grant PUD**
  - "Add commitment to execute Interim Service agreement and/or redispach of non-federal resources in Markets+ as substitute for elements of Data Exhibit. Allow redispach of non-federal resource in Markets+ to address sub-grid constraints and limits on ability to redispach federal resources. Consider additional "off-ramps" that require applicants to demonstrate commitments in order to stay in queue."
- **NewSun Energy**
  - "Recognize and be aligned with fundamental principles of open access—namely that all wholesale buyers and sellers of electric energy can obtain non-discriminatory transmission access..."
  - "Ensure any changes do not create an anti-competitive transmission environment."
  - "No additional evaluation criteria would be applied to the current queue (requests in the queue before BPA's announced pause on 2/5/2025)..."
- **Obsidian Renewables**
  - "A strategy of trying to reduce the existing queue based on new standards will not get us where we want to be. It will not be fast or efficient and will likely spawn litigation."
- **SCL**
  - "...believes if BPA granted CFS with sufficient minimum contract length, limited deferral, and securitization; most speculative requests would remove themselves from the queue under this framework."
- **Tacoma Power**
  - "...does not support any OATT change recommendation from BPA that step away from pro forma open access requirements."
- **UEC**
  - "Any changes to existing policies, procedures, and tariff provisions adopted as a result of this effort must be based on organic law, uphold BPA's long-term planning obligations for NT customers, be consistent with or superior to FERC policies and procedures, and not infringe on any transmission customer's existing contractual rights."

# Plan of Service for Source Maturity (EC-SM)

## Clarification

These requirements would not apply to wheel-through transactions and PORs/PODs associated with interties and other (non-BPA) BAAs.

## General Theme

There was some concordance on Completion of GI Phase One Cluster Study and Execution of GI Phase Two Cluster Study Agreement. Some commentors would like BPA to focus on more ready requests.

- **NIPPC and RNW**
  - “For transition, prefer options which would focus transmission study on requests that are in late-stage process of interconnection queue; concern that projects in the generator interconnection transition cluster would not be able to be operating before 2030.”
- **Brookfield Renewable**
  - “For transition, only accept GIs that are late stage and bypass.” (In response to EC-SM-ALT-1.)
- **Public Power Council**
  - “[Our] initial leaning is that this appears to strike the right balance of getting some customer commitment while moving forward quickly enough that GI and transmission projects can move forward in parallel.” (In response to EC-SM-ALT-5.)
- **Tacoma Power**
  - “[We support] EC-SM-ALT-5, with the caveat that it must be possible to have executed a Phase Two Cluster Study Agreement.”
- **NRU**
  - “These alternatives appear to strike a reasonable balance between progress in the interconnection process and when the customer should be able to be studied for transmission.” (In response to EC-SM-ALT-5 and 6.)

# Staff Leaning: Source Maturity (EC-SM)

## Source Maturity Alternatives

- **EC-SM-ALT-1:** For transition, only accept GIs that are late stage or bypass
- **EC-SM-ALT-2:** LGIA executed
- **EC-SM-ALT-3:** Issuance of the GI Facilities Study Report
- **EC-SM-ALT-4:** Completion of GI Phase Two Cluster Study
- **EC-SM-ALT-5:** Completion of GI Phase One Cluster Study AND Execution of GI Phase Two Cluster Study Agreement
- **EC-SM-ALT-6:** Completion of Phase One of the GI study plus any needed restudy
- **EC-SM-ALT-7:** Completion of Phase One GI study report
- **EC-SM-ALT-8:** Consultant GI Study
- **EC-SM-ALT-9:** Minimal GI Criteria
- **EC-SM-ALT-10:** Incent LSE Engagement by Providing POR Flexibility



## Customer Support:

- **EC-SM-ALT-1:** For transition, only accept GIs that are late stage or bypass
- **EC-SM-ALT-2:** LGIA executed
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- **EC-SM-ALT-9:** Minimal GI Criteria
- **EC-SM-ALT-10:** Incent LSE Engagement by Providing POR Flexibility

## Staff Leanings

- **EC-SM-ALT-1:** For transition, only accept GIs that are late stage or bypass
- For TSRs submitted after the noticed date: **EC-SM-ALT-5:** Completion of GI Phase One Cluster Study AND Execution of GI Phase Two Cluster Study Agreement (or equivalent)

# Source Maturity (EC-SM) Staff Leaning

## Staff Leaning

For Source Maturity for (F)TSRs entering the queue prior to date in notice:

- For (F)TSRs that are seeking physical interconnection to the BPA network that cite a generation source that does not currently exist, BPA will require Late Stage or Bypass level of source maturity (EC-SM-ALT-1). If the cited source is participating in the small generator interconnection process, the System Impact Study must be completed. All other (F)TSRs will be declined.

## Rationale

- Source Point of Interconnection (POI) becomes the Point of Receipt (POR). The POR is unknown until the Source POI provides that information)
- BPA is focused on providing interim CFS to those (F)TSRs that need it and are ready to use it in the near term.
- The source maturity is important for providing BPA with information to determine its ability to manage the interim CFS as well as expansion plans of service.
- Data requirements proposed in TC-27 will apply both in the transition period and become the foundation for the future state unless otherwise indicated. OATT Completed Application Requirements/Application Procedures require queue order for transmission planning for (F)TSRs that meet those requirements. BPA's proposal pivots BPA toward fuller OATT implementation.
- All parties seeking transmission from BPA for resources that are seeking physical interconnection to the BPA network must have an established POI to meet the requirements. BPA's queue should not allow (F)TSRs to encumber capacity ahead of (F)TSRs that do not meet source maturity requirements or other OATT completed application criteria. BPA's queue must contain mature (F)TSRs so those requests have first access to capacity on the existing transmission system for interim CFS. BPA acknowledges those requests would also have first access to transmission expansion project capacity.

# Source Maturity (EC-SM) Staff Leaning (cont.)

## Staff Leaning

For Source Maturity for TSRs entering the queue after the date in notice:

For (F)TSRs that are seeking physical interconnection to the BPA network that cite a generation source that does not currently exist, BPA will require a demonstration of Source Maturity of at least an executed GI Phase Two Cluster Study agreement (EC-SM-ALT-5) or equivalent. If the cited source is participating in the small generator interconnection process, the System Impact Study must be completed. All other (F)TSRs will be declined.

## Rationale

- Source Point of Interconnection (POI) becomes the Point of Receipt (POR). The POR is unknown until the Source POI provides that information)
- Focuses planning for long-term firm transmission first on (F)TSRs that can support the region in the near term and then on transmission for resources that can potentially support the region in later years.
- Continues to allow BPA to focus any CFS (consistent with construct at that time) and development of commercial plans of service on transmission that can be utilized to meet the near-term needs of the region during the transition period.

	# of Customers	# of TSRs	Demand (MW)
<b>Online</b>	22	84	9,154
<b>Late Stage/Bypass</b>	12	94	11,476
<b>Not IC to BPA BAA</b>	29	180	18,320
<b>Total</b>	46	<b>358</b>	<b>38,950</b>

12pm 8/19/2022

Open of Study Window for participation in the 2025 TSEP CS

12pm 8/15/2024

Close of Study Window for participation in the 2025 TSEP CS

**New Cut-Off**

Date in Notice

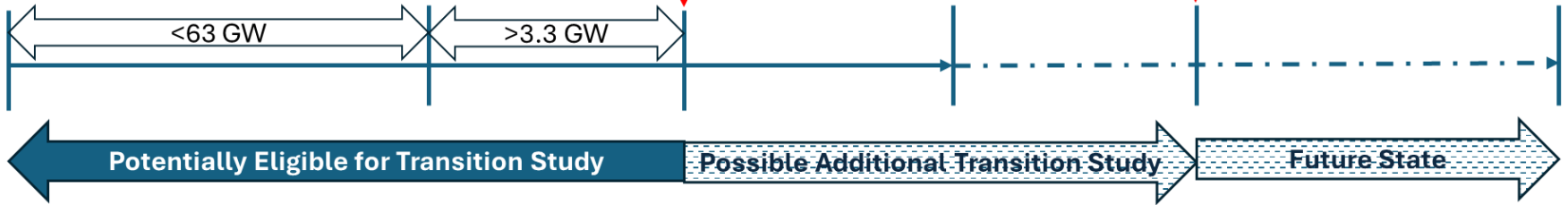
**Transition Study**

BPA to conduct at least one transition study

**Future State Cut-Off**

Date in Notice

**Proactive Planning Program**  
(Future State)



**Prior to Date in Notice:** (F)TSRs in/entering the queue prior to the issuance of a notice date (TBD), BPA will require On-line, Late Stage or Bypass level of source maturity (EC-SM-ALT-1).

- TSRs that do not meet this criteria will be removed from the queue, regardless of when they entered the queue (QM-HNS-ALT3: 2025 TSEP CS).

**Timing between Date in New Cut-off Notice and Implementation of Proactive Planning:** To run additional transition studies there needs to be enough time between the transition study and the implementation of the future state for the study to be completed. BPA will provide notice (Future State Cut-Off) where all TSRs submitted after that date will be studied in the future state (not the transition process).

**After Date of New Cutoff Notice:** (F)TSRs entering the queue after the date in the Future State Cut-Off Notice BPA will require a Source Maturity of at least an executed GI Phase Two Custer Study Agreement (EC-SM-ALT-5) or equivalent.

**Study for Plan of Service in Future State.**

# Staff Leaning: Handling New (F)TSR Submissions (QM-HNS)

## Alternatives

### QM-HNS (Handling New (F)TSR Submissions)

- **QM-HNS-ALT-1:** Decline All (F)TSRs submitted after 12pm 8/15/24
- **QM-HNS-ALT-2:** Study (F)TSRs in Proactive Planning Program (Future State)
- **QM-HNS-ALT-3:** Include in 2025 TSEP CS Group
- **QM-HNS-ALT-4:** Second Transition Study



## Customer Support

### QM-HNS (Handling New (F)TSR Submissions)

- **QM-HNS-ALT-2:** Study (F)TSRs in Proactive Planning Program (Future State)
- **QM-HNS-ALT-3:** Include in 2025 TSEP CS Group



## Staff Leanings

### QM-HNS (Handling New (F)TSR Submissions)

- **QM-HNS-ALT-2:** Study (F)TSRs in Proactive Planning Program (Future State)
- **QM-HNS-ALT-3:** Include in 2025 TSEP CS Group

# Handling New (F)TSR Submissions (QM-HNS)

- **Staff Leaning:**
  - Study in Future State (QM-HNS-ALT-2)
- **Staff Leaning:**
  - 2025 TSEP Cluster Study (QM-HNS-ALT-3)
- **Rationale**
  - This set of alternatives was developed presuming there would be a study during the transition that resulted in a complete plan of service.
  - Therefore, BPA is envisioning a combination of these two alternatives for transition.
    - BPA will process all requests in the queue for the Transition Process using a specified cut-off date.
    - BPA will provide notice of when requests submitted to the long-term firm queue will be studied in the future state.
    - BPA will defer a study to identify a plan of service for the Future State.
  - Consistent with the goal of providing service to customers with requests ready to take service in the nearer-term.

# Delivering/Receiving Party Validation (EC-PV)

## General Theme

Substantial expressions of discomfort with validation of Delivering/Receiving party...If BPA is going to adopt this approach, a number of parties supported having a financial option. However, there was some support both for requiring confirmation from the delivering/receiving party with potential queue removal and for utilizing contingent validation.

- **Powerex**

- “While Powerex understands BPA’s concern, these limited circumstances do not support imposing additional restrictions or data exhibit requirements on all customers....BPA could also revise its data exhibit forms to ask customers to indicate whether a customer listing a generator or load within the BPA BAA has an ownership stake or contractual arrangement with the source or sink.”

- **Seattle City Light**

- “...applying these criteria pose unnecessary risk for BPA.”

- **Avangrid**

- “...does not believe Bonneville has provided sufficient justification to move away from the status quo.”

- **PPC**

- “PPC understands the issue that BPA is trying to address and shares concerns about parties speculatively requesting transmission service in a manner that blocks a resource developer pursuing a project or a Load Serving Entity from directly procuring needed transmission from BPA. ...EC-PV-ALT-10 (adopt Dispute Mechanism) is likely the most defensible approach.”

- **Puget Sound Energy**

- “PSE supports contingent validation of delivering/receiving party with removal from the queue if a deal is not executed.”

- **Brookfield Renewable**

- “Require confirmation of delivering/receiving party; if not, remove from queue.... Do not rely on executed contracts.”

- **NewSun Energy**

- “...simply listing the POR and POD is sufficient.”

# B O N N E V I L L E P O W E R A D M I N I S T R A T I O N

## Staff Leaning: Delivering/Receiving Party Validation (EC-PV)

### Replaced by Source Owner Validation

#### Delivering/Receiving Party Previous Alternatives

- **EC-PV-ALT-1:** Require confirmation of Delivering/Receiving Party; if not remove from queue
- **EC-PV-ALT-2:** Utilize contingent validation; remove from queue if deal not executed
- **EC-PV-ALT-3:** If unable to provide required bilateral demonstration, provide only Reassessment CFS or Interim Service
- **EC-PV-ALT-4:** Allow financial demonstration in lieu of required bilateral demonstration; if not provided remove from queue
- **EC-PV-ALT-5:** Require FERC marketer registration if no bilateral demonstration; if not remove from queue
- **EC-PV-ALT-6:** Short-term market only if bilateral demonstration unavailable; remove from (LTF) queue
- **EC-PV-ALT-7:** Only Offer Up to 4 years, 11 months
- **EC-PV-ALT-8:** Use points system for validation
- **EC-PV-ALT-9:** Contingent Validation with Financial Option to Retain TSR
- **EC-PV-ALT-10:** Allow a Dispute Mechanism – Only request verification when another party suggests that the information was incorrectly supplied
- **EC-PV-ALT-11:** Status Quo, take information at face value without any further validation or confirmation

#### Source Owner Validation New Alternative

- **EC-PV-ALT-12:** For F/TSRs citing a generation source physically connected to BPA's network, and for which the submitting party is not the source owner or an affiliate, validate use of the TSR to transmit the cited source generation

#### Customer Support

- **EC-PV-ALT-1:** Require confirmation of Delivering/Receiving Party; if not remove from queue
- **EC-PV-ALT-2:** Utilize contingent validation; remove from queue if deal not executed
- **EC-PV-ALT-3:** If unable to provide required bilateral demonstration, provide only Reassessment CFS or Interim Service
- **EC-PV-ALT-4:** Allow financial demonstration in lieu of required bilateral demonstration; if not provided remove from queue
- **EC-PV-ALT-9:** Contingent Validation with Financial Option to Retain TSR
- **EC-PV-ALT-10:** Allow a Dispute Mechanism – Only request verification when another party suggests that the information was incorrectly supplied
- **EC-PV-ALT-11:** Status Quo, take information at face value without any further validation or confirmation

#### Staff Leanings

##### • **New: EC-PV-ALT-12**

- For (F)TSRs citing a generation source physically connected to BPA's network, implement source owner validation.
- This staff leaning is predicated on adopting higher financial requirements and on requirements for PTP requests sinking to a NITS POD. Adopt more substantial financial requirements for analysis and CFS eligibility.

**New  
Alternative**

# Source Owner Validation (Replacement for EC-PV) Staff Leaning

## New Alternative

Source Relationship - 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 that the source owner (i.e., the TSR may be used to transmit power from the cited source). Without such evidence, the TSR will be declined.

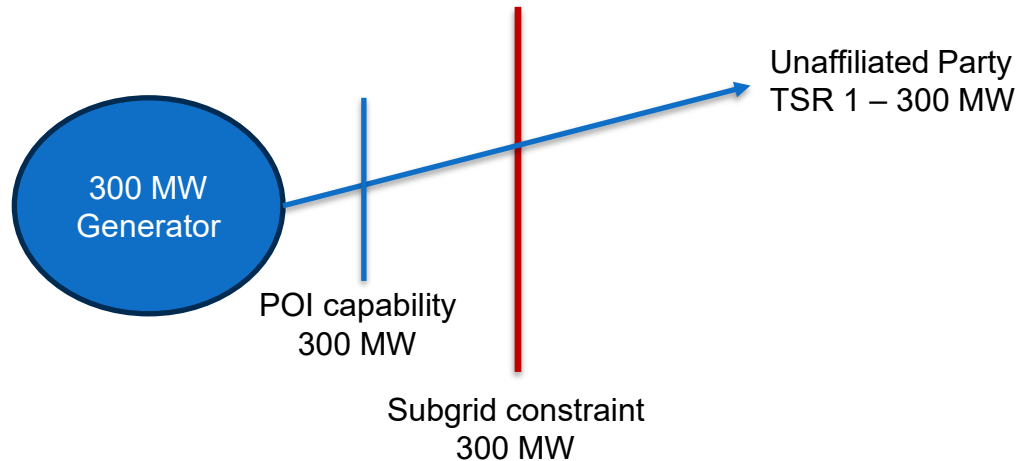
## Rationale

- BPA's holistic business model needs to address the issues the original Delivering/Receiving Party alternative endeavored to address. As long as BPA is able to utilize this validation for Source Relationship and PTP TSRs delivering to NITS load, and the outlined financial requirements, that combination addresses the drivers associated with the original alternatives.
- For a TSR submitted by a party who is not the owner or an affiliate of the owner of the cited source for which the TSR will be used to transmit power, acknowledgement by the cited source owner that the resource owner is the source of record to identify the transmission that may be used to move energy from their generator.
- BPA needs to avoid risk of awarding unstudied transmission service (i.e., transmission that can be used to serve a generator that later locates in the same area and then utilizes previously awarded long-term firm).
- This new alternative impacts fewer parties and fewer TSRs.

*\*BPA will further develop the form of the evidence required.*

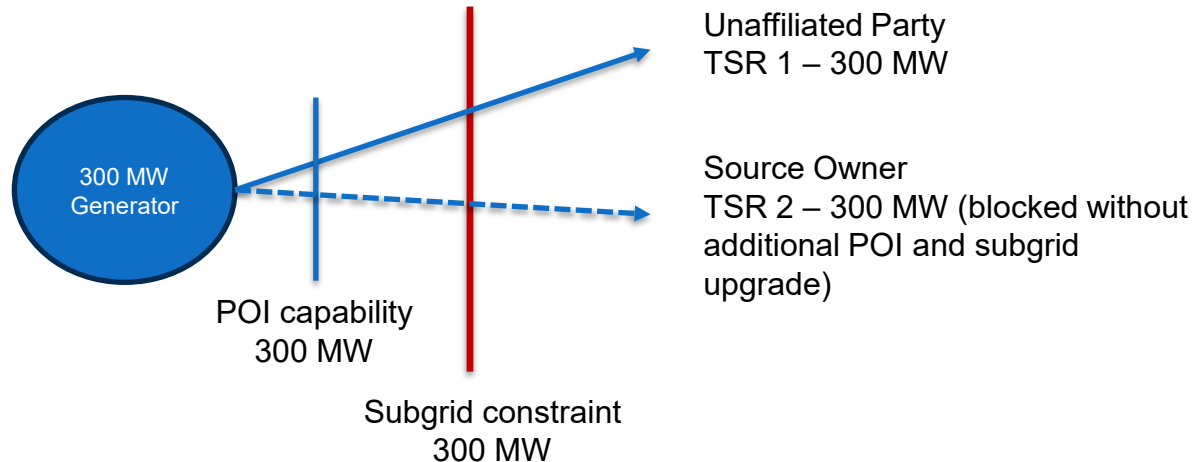
# Source Owner Validation: Blocking Concern

**Initial Scenario:** The source owner has not submitted a TSR yet. A party not affiliated with the source owner submits a TSR from the source. Under current rules, BPA could either award service to the unaffiliated party or completed a study of the unaffiliated party's TSR citing that resource.



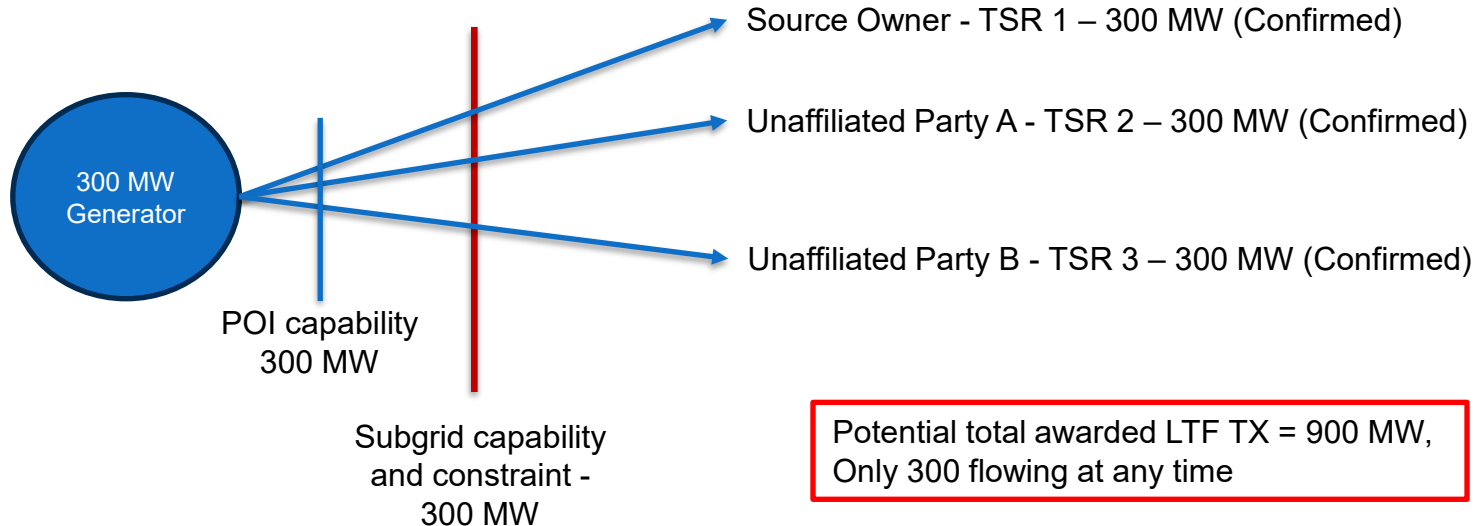
# Source Owner Validation: Blocking Concern

**Subsequent Scenario:** Later, the source owner submits a request for transmission citing their resource as the generation source. The ability to accurately study the source owner's new TSR is "blocked" because BPA modeled the generation from the resource for the previously submitted TSR.



# Source Owner Validation: Studied vs. Unstudied Transmission Concern

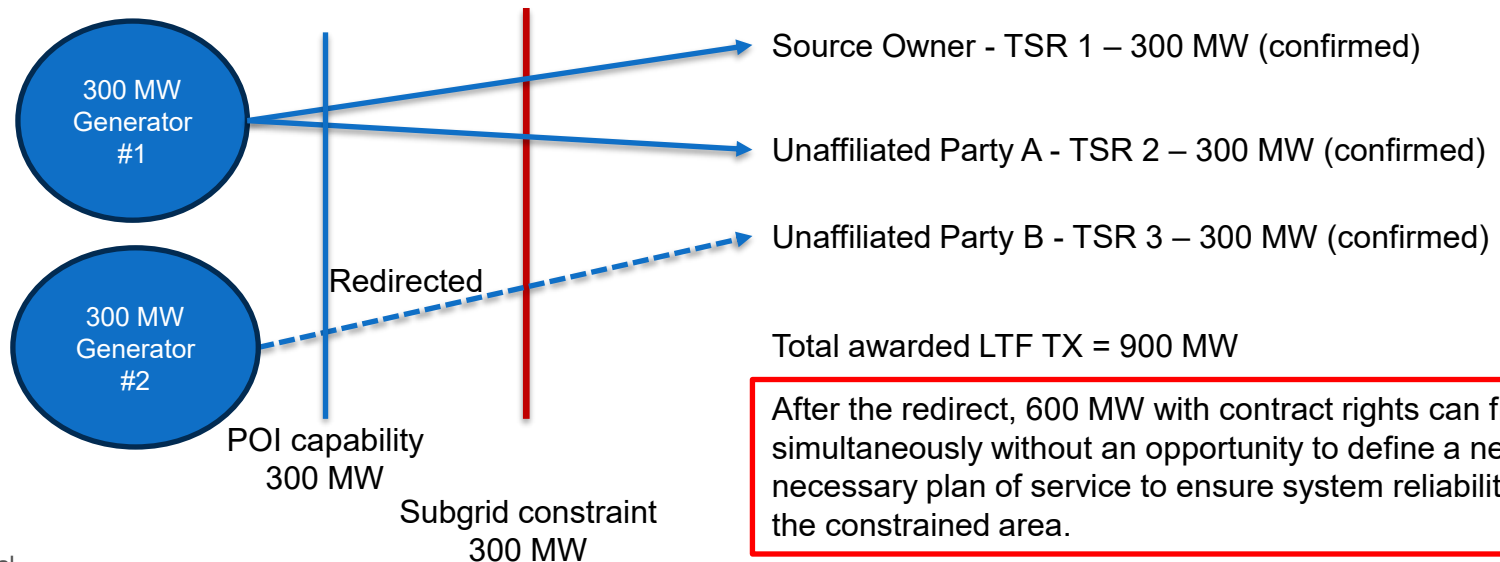
**Initial Scenario:** Three TSRs cite the same resource. All 3 TSRs are confirmed (studied). Only 300 MW can flow at any time. The 300 MW modeled from the source does not identify a flow-based need to upgrade system capability for that area of the transmission system.



# Source Owner Validation: Studied vs. Unstudied

## Transmission Concern

**Subsequent Scenario:** TSRs 1 – 3 are confirmed (studied) TSRs. An additional generator (#2) is added. Generator #2 impacts the same system constraint as Generator #1. TSR 3 is redirected to the new Generator #2. In this case, all previously awarded rights cannot flow reliably.



# Plan of Service for Load Maturity (EC-LM)

## Clarification

LLIR maturity is only needed when the (F)TSR will be used to serve a new load that requires an LLIR.

## General theme

Some support for System Impact Study required to be started or completed. Some preferences for a significantly lower requirement.

- **Public Power Council**
  - "...initial leaning is that either EC-LM-ALT3 [sic] (SIS) is started or completed or EC-LM-ALT4 [sic] (feasibility study is completed), could be appropriate options that balance the need for BPA to have additional information while not preventing customers from requesting transmission until too late in the process."
- **NRU**
  - "These alternatives appear to strike a reasonable balance between maturity and transmission service viability." (In response to ALT-4 & 5.)
- **Seattle City Light**
  - "City Light supports EC-LM-ALT-2: Facilities Study required to be completed."
- **Brookfield Renewable**
  - "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."
- **PNGC Power**
  - "Load maturity needs to be accepted when the request is submitted by an LSE and the load is behind the meter on the LSE's system withing BPA's BA."
- **Cowlitz PUD**
  - "This option seems to be the best use of BPA personnel time. At this stage there should be some certainty that the project will move forward. There is still some risk that the customer won't move forward, but the customer is shouldering more of the risk at this point than BPA would be exposed to by an order of magnitude." (in response to ALT-3)
- **PGE**
  - "We support establishing new requirements and parameters that ensure readiness to take service before entering BPA's TSR queue." (In response to ALT-1.)

# Staff Leaning: Load Maturity (EC-LM)

## Load Maturity Alternatives

- **EC-LM-ALT-1:** Must be in execution phase (agreements signed/funded)
- **EC-LM-ALT-2:** Facilities Study required to be completed
- **EC-LM-ALT-3:** System Impact Study required to be started or completed
- **EC-LM-ALT-4:** Feasibility Study required to be completed
- **EC-LM-ALT-5:** LLIR must be submitted, but no study required
- **EC-LM-ALT-6:** No requirement for LLIR submittal



## Customer Support – varied widely, leaned toward lower levels of LLIR maturity

- **EC-LM-ALT-1:** Must be in execution phase (agreements signed/funded)
- **EC-LM-ALT-2:** Facility Study required to be started or completed
- **EC-LM-ALT-3:** System Impact Study required to be started or completed
- **EC-LM-ALT-4:** Feasibility Study required to be completed
- **EC-LM-ALT-5:** LLIR must be submitted, but no study required
- **EC-LM-ALT-6:** No requirement for LLIR submittal

## Staff Leanings

- **EC-LM-ALT-2:** Facilities Study required to be completed

# Load Maturity (EC-LM) Staff Leaning

## Staff Leaning

- If LLIR is needed, Facilities Study is required to be completed (EC-LM-ALT-2). All other (F)TSRs will be declined.

## Rationale

- Load Point of Interconnection (POI) becomes the electrical Point of Delivery (POD). The POD is unknown until the load POI provides that information
- Customer has received the proposed scope, schedule, and budget for the LLIR project.
- OATT Completed Application Requirements/Application Procedures provide queue order for transmission planning for those parties who meet the requirements. BPA's proposal pivots BPA toward fuller OATT implementation.
- All parties seeking transmission from BPA for new load need to take steps to have the pursue the load interconnection plan of service. Parties who have a mature load POI sooner should have higher queue position for transmission service. That is consistent with OATT requirements for F/TSR submittal.
- BPA's queue should provide plans of transmission service in an order that reflects order in which customer's cited load achieves source plan of maturity.
- Plan of service for new load must be known to enable study for firm or conditional firm service.
- This level of maturity for load plan of service has a high historical instance of moving forward to construction.
- In many instances, for NITS customers with new load LLIR study costs are not charged to the customer.

# PTP Requests to NITS POD (EC-PTP)

## General Theme

- Customer feedback on this topic was varied with leaning toward requiring demonstration of interest from NITS customers upon submittal with NITS and PTP customers expressing somewhat different preferences:
- **PPC**
  - “PPC supports BPA seeking to prevent situations where speculative requests to a NITS POD, not initiated by the NITS customer or a confirmed counterparty, are blocking access to capacity needed to serve load at that location.”
- **NWCPUD**
  - “No parties should be requesting service to our NT PODs without NWCPUD’s agreement.” For valid request, NWCPUD would be ready/able to provide attestation of active negotiation.”
- **Brookfield Renewable**
  - “...likely to oppose requiring NITS customers to submit PTP requests absent more compelling justification.”
- **NewSun**
  - “...there could be a solution path here where BPA works with transmission customers to transfer the request to an existing nearby POD or to establish a new PTP POD nearby.”
- **NIPPC and RNW**
  - “Agree that NITS customers should not be constrained in their resource selection because a PTP request encumbers available capacity to serve increased NITS load.”
- **PGE**
  - “We support the demonstration of interest between the PTP requestor and the NITS customer.” (In response to EC-PTP-ALT-1.)

# Staff Leaning: PTP Requests to NITS PODs (EC-PTP)

## PTP Requests to NITS POD Alternatives

- **EC-PTP-ALT-1:** Require demonstration of interest from NITS customer upon submittal
- **EC-PTP-ALT-2:** Require demonstration prior to execution of contract
- **EC-PTP-ALT-3:** Only NITS Customers Allow to Submit PTP TSRs to serve their load
- **EC-PTP-ALT-4:** Status Quo

## Customer Support

- **EC-PTP-ALT-1:** Require demonstration of interest from NITS customer upon submittal

## Staff Leanings

- **EC-PTP-ALT-1:** Require demonstration of interest from NITS customer upon submittal. NITS Customer's LARC must include the resource upon submittal of the PTP TSR and reference use of PTP transmission for it. In addition, the LARC must continue to contain the resource and use of PTP transmission for it to enable the PTP TSR to remain valid over time).

# PTP Requests to NITS POD (EC-PTP) Staff Leaning

## Staff Leaning

Require demonstration of interest from NITS customer upon submittal (EC-PTP-ALT-1). NITS customer's LARC must include forecast of the relevant resource and reference use of PTP transmission for it. PTP TSR remains valid only as long as the NITS customer's LARC continues to contain the resource and indicate NITS customer plan to use PTP transmission for it.\*

## Rationale

BPA works with its NITS customers to plan for service to their load. If the NITS customer is not planning to serve their load using PTP, BPA should not be planning for transmission to serve the NITS customer's load in a manner that the NITS customer is not planning on.

## Details

This approach would not require the NITS customer to change their LARC, although they would have the opportunity to provide an update to it during the cure period (assuming a relevant deficiency is identified) to enable the PTP request to be validated/remain valid. Out-of-cycle LARC updates could be used (as applicable) for this validation.

\*As is the case when a data exhibit becomes invalid for any other reason, BPA will inform the TSR submitter of the issue They have a cure period to address the issue prior to BPA action to decline the TSR.

# Battery-to-Battery Modified to Battery Stand-Alone Load (EC-B2B)

## Observation

Planning associated with batteries is relatively new to the industry and as a result, the industry continues to have robust discussions around planning issues related to them.

## General Themes

Parties generally either supported status quo or ALT-2; a few parties suggested further policy development.

- **Seattle City Light**

- “City Light recommends BPA develop a more comprehensive policy concerning storage devices addressing the concerns regarding these devices both as a source and a load.”

- **Avangrid**

- “...encourage Bonneville to either work informally with customers when situations arise or establish a more robust policy on batteries so that all customers with batteries are treated comparably.”

- **NRU**

- “...no specific feedback on these alternatives but Alt 2 [*sic*] seems the most reasonable,” NRU.

- **Tacoma Power**

- “...supports EC-B2B-ALT-3 allowing LTF battery to battery F/TSRs.”

- **Brookfield and Transalta:**

- Indicated preference for “Allow if Customer can provide reasonable scenario” alternative.

# Staff Leaning: Battery-to-Battery (EC-B2B) Modified to Battery as Load

## Battery-to-Battery Previous Alternatives

- **EC-B2B-ALT-1:** Disallow battery-to-battery LTF F/TSRs
- **EC-B2B-ALT-2:** Allow battery-to-battery F/TSRs if Customer can provide reasonable scenarios
- **EC-B2B-ALT-3:** Allow LTF battery-to-battery F/TSRs

## Battery as Load New Alternative

- **EC-B2B-ALT-4:** Disallow any TSR for which battery is cited as stand-alone load; Develop a policy to address viability of LTF transmission as stand-alone load prior to allowing such TSRs into the LTF transmission queue.

## Customer Support

- **EC-B2B-ALT-2:** Allow battery-to-battery F/TSRs if Customer can provide reasonable scenarios
- **EC-B2B-ALT-3:** Allow LTF battery-to-battery F/TSRs

## Staff Leanings

- **New: EC-B2B-ALT-4**
  - Disallow battery to battery LTF/F/TSRs AND any TSR delivering to a battery that is cited as the stand-alone load; Develop a policy to address viability of LTF transmission for batteries cited as stand-alone load prior to allowing into the LTF transmission queue.

# Battery-to-Battery (EC-B2B) Staff Leaning

## Staff Leaning

- At this time, disallow battery to battery LTF (F)TSRs AND any (F)TSR delivering to a battery that is cited as stand-alone load. Decline these TSRs and disallow further such TSRs unless/until BPA adopts a policy to allow batteries as “load” for LTF transmission service.

## Rationale

- Batteries do not function like any other form of load. While they serve as a temporary sink for power (i.e., negative generation), they store energy rather than consuming it. BPA agrees with those customers who noted that BPA needs to develop policy to address the question of whether batteries can function as stand-alone load for LTF (F)TSRs. BPA will make a future determination of whether batteries will be allowable as stand-alone “load.”

# MIDCRemote/NWHUB (EC-VHUB)

## General Theme

Basically, unanimous customer comments regarding dislike of removal of both MIDCRemote and NWHUB (ALT-4). A large number of customers indicated willingness to support removal of MIDCRemote with conformance of unstudied TSRs to NWHUB (ALT-1-SUB-A and SUB-B). Others expressed some preference for ALT-6 (Active support for NW Hub) to maintain firm transmission for virtual point transactions for market liquidity.

- **Powerex**

- "...does not support alternatives that would remove NWHUB, as it supports legitimate commercial activity and facilitates an efficient open access market."

- **PPC**

- "Customers should be able to secure priority 6 or higher service from a market hub that will allow them to adequately hedge their position through congestion allocation once BPA joins Markets+."

- **NWCPUD**

- "...primary goal is to have access to NWHUB (or other virtual point/hub such as ColumbiaMkt [sic]) as a long-term product and, if necessary, secure FTSRs for the service from that POR to load."

- **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."

- **UEC**

- "First, we are keenly interested in maintaining use of these points as a POR for service to load. While not optimal, we recommend that BPA adopt either Alt-2 (Offer Reassessment CFS at MIDCRemote/NWHUB) or Alt 3 (Mixed Firm and Reassessment CFS)."

# Staff Leanings: Virtual Hubs (EC-VHUB)

## MIDCRemote/NWHUB Alternatives

- **EC-VHUB-ALT-1:** Remove Mid-C Remote only (Mid-C vs NW Hub)
  - **EC-VHUB-ALT-1-SUB-A:** Remove Mid-C Remote Only
  - **EC-VHUB-ALT-1-SUB-B:** Conform to NW Hub
- **EC-VHUB-ALT-2:** Offer Reassessment Only
- **EC-VHUB-ALT-3:** Mix of Firm and CF
- **EC-VHUB-ALT-4:** Remove both from the LFT market
- **EC-VHUB-ALT-5:** Require TSR pairing at NW Hub
- **EC-VHUB-ALT-6:** Actively support LFT use of NW Hub
- **EC-VHUB-ALT-7:** Status Quo



## Customer Support

- **EC-VHUB-ALT-1:** Remove Mid-C Remote only (Mid-C vs NW Hub)
- **EC-VHUB-ALT-1-SUB-B:** Conform to NW Hub
- **EC-VHUB-ALT-7:** Status Quo



## Staff Leanings

- **EC-VHUB-ALT-1:** Remove Mid-C Remote only (Mid-C vs NW Hub)
- **EC-VHUB-ALT-1-SUB-B:** Conform to NW Hub
- **EC-VHUB-ALT-2:** Offer Reassessment Only

# Virtual Hubs (EC-VHUB) Staff Leaning (Part 1)

## Staff Leaning

- **Remove Mid-C Remote only; Conform to NW Hub, Grant, Chelan or Douglas-(EC-VHUB-ALT-1-SUB-B)**

## Rationale

- Retain NWHUB as customers place a high value on ability to access long-term transmission at a virtual point to support flexibility for a variety of needs (see following staff leaning re: NWHUB (F)TSRs).

## Additional Details

- Customers may conform the POR or POD to NW Hub, or a specific physical point of Grant, Chelan or Douglas' system if preferred by the customer. BPA will develop a plan of service for TSRs that choose a physical point in lieu of MIDCRemote.
- Conformances would be at the current queue position
- No changes to:
  - access to MIDCRemote or NWHUB in the short-term market.
  - existing LTF TSRs that have MIDCRemote or NWHUB PORs or PODs.
  - MIDCRemote or NWHUB TSRs in study status that have a plan of service.

# Virtual Hubs (EC-VUB) Staff Leaning (Part 2)

## Staff Leaning

- Offer only Reassessment CFS at NWHUB (EC-VHUB-Alt 2)

## Rationale

- Planning physical expansion of the transmission system for (F)TSRs seeking access to a virtual path would require BPA to use assumptions that are known to be inaccurate. This alternative also continues to provide customers with access to long-term reservations for a virtual point.

# Additional Data if Needed for Planning (EC-ADD)

## Observation

Rapid change in the industry further underscores BPA's need to require additional information that it did not identify the need for in advance of submittal.

CFS Team discussions have continued to underscore the need for BPA to be able to require additional information to plan appropriately for requests.

## General Theme

Mixed feedback with preference for status quo

- **Seattle City Light**

- “City Light supports EC-ADD-ALT-1: Modify section 17.2(x) and 29.2(ix) to read “Attachment K and other BPA transmission planning processes”

- **Powerex**

- “...it is premature to pursue a tariff change to expand the information BPA can request.”

- **Brookfield Renewable**

- “Brookfield Renewable does not object to the proposed language...understands that BPA functions on this basis today.” (In response to ALT-1.)

- **PPC**

- “BPA should be as clear as possible about the types of data that it will need to request. PPC does not oppose the proposed change to the tariff but would like to further clarify if BPA believes this is an authority that exists today under the current OATT.”

- **NewSun Energy**

- “BPA should not have carte blanche discretion to require that any additional information be submitted via BPA's data exhibit process, with a potential ramification being removal of the queue position for not submitting the data.”

- **Avangrid**

- “...would recommend maintaining the status quo...If Bonneville feels this language is absolutely necessary then a dispute resolution process should also be adopted.”

- **NIPPC and RNW**

- “Preferred option if tariff change is required to implement TC-27 reforms.” (In response to ALT-1.)

## Staff Leaning: Additional Information (EC-ADD)

### Additional Information Alternatives

- **EC-ADD-ALT-1:** Modify section 17.2(x) and 29.2(ix) to read “Attachment K and other BPA transmission planning processes”
- **EC-ADD-ALT-2:** Use existing language in 17.2(x) and 29.2 (ix) Any additional information required by the Transmission Provider’s planning processes established in Attachment K



### Customer Support

- **Status Quo**
- **EC-ADD-ALT-2:** Use existing language in 17.2(x) and 29.2 (ix) Any additional information required by the Transmission Provider’s planning processes established in Attachment K



### Staff Leanings

- **EC-ADD-ALT-1:** Modify section 17.2(x) and 29.2(ix) to read “Attachment K and other BPA transmission planning processes”

# Additional Information (EC-ADD) Staff Leaning

## Staff Leaning

- Modify section 17.2 (x) and 29.2 (ix) to read “...Attachment K and other BPA transmission planning processes.” EC-ADD-ALT-1.

## Rationale

- It benefits BPA and its customers to have BPA’s OATT be as clear as possible that BPA may require information regarding a TSR in the future if necessary for planning processes.
- If additional information is needed to process the request, BPA will continue to work with its customers to endeavor to obtain that information.
- BPA’s OATT already contains a dispute mechanism that customers can use if needed.

# Minimum Capitalization (EC-MCAP)

## General Theme

Some support for adoption with exemption for parties with demonstrable financial strength/ability to raise rates using scaled capitalization requirement with some support for status quo as well:

- **NRU**

- “Barring additional information regarding what risks a min cap requirement is intended to mitigate that BPA’s existing financial policies fail to address, lean toward keeping status quo.”

- **NewSun Energy**

- “Imposing a minimum capitalization requirements is a non-starter. It is financially discriminatory and anticompetitive.”

- **NIPPC and RNW**

- “Support development of more stringent evaluation criteria, including minimum capitalization requirements.”

- **Snohomish PUD**

- “...primarily supports exemption of any minimum capitalization requirements for LSEs with a specified service territory and ability to raise its rates...For those non-exempt entities, Snohomish supports a scaled minimum capitalization based on the level of transmission service in the study.”

# Staff Leaning: Minimum Capitalization (EC-MCAP)

## Minimum Capitalization Alternatives

- **EC-MCAP-ALT-1:** Minimum capitalization requirement scaled based on level of transmission service request activity in study.
- **EC-MCAP-ALT-2:** Flat minimum capitalization requirement regardless of level of transmission service request activity in study.
- **EC-MCAP-ALT-3:** Status Quo – do not have a minimum capitalization requirement.

## Customer Support

- **EC-MCAP-ALT-1:** Minimum capitalization requirement scaled based on level of transmission service request activity in study.
- **EC-MCAP-ALT-3:** Status Quo – do not have a minimum capitalization requirement.

## Staff Leanings

- **EC-MCAP-ALT-3:** Status Quo – do not have a minimum capitalization requirement.

# Minimum Capitalization (EC-MCAP) Staff Leaning

## Staff Leaning

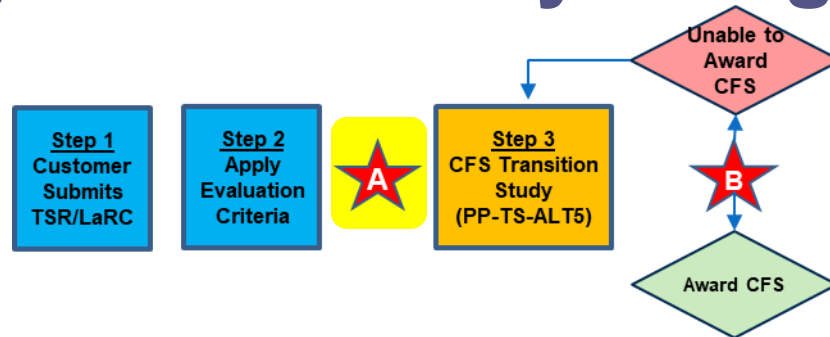
- The transition business model, as staff leaning describes, focuses on offering conditional firm service prior to a study for a complete plan of service and includes increased study fees and securitization requirements to remain in the queue (through the Contingent CFS Analysis Agreement). As a result, BPA does not need to apply minimum capitalization requirements to the TSRs in the transition phase. However, BPA will continue to evaluate minimum capitalization requirements for implementation in the future.

## Rationale

- BPA can mitigate risks in various ways and the staff leaning transition business model mitigates risks which may be addressed by min cap through other means. Future business models may require reconsideration of the Minimum Capitalization proposal.



# Star A Contingent CFS Analysis Agreement



# Contingent CFS Analysis Agreement

- One Package that contains:
  - CFS Analysis Agreement and Fees
  - Security Obligation
  - Commitment for an award for CFS, if or when available
    - Bridge or Reassessment, whichever is applicable

# Staff Leaning: Mandatory-Voluntary (IS-MV)

## Alternatives

### IS-MV

- **IS-MV-ALT-1:** Mandatory for early access
- **IS-MV-ALT-2:** Not mandatory until POS has been developed
- **IS-MV-ALT-3:** Status Quo - Not Mandatory



## Customer Support

### IS-MV

- **IS-MV-ALT-2:** Not mandatory until POS has been developed
- **IS-MV-ALT-3:** Status Quo - Not Mandatory



## Staff Leanings

### IS-MV

- **IS-MV-ALT-1:** Mandatory for early access

# Mandatory-Voluntary (IS-MV) Staff Leaning

- **Staff Leaning**

- Mandatory for Early Access (IS-MV-ALT-1)

- Signing the Contingent CFS Analysis Agreement commits the Customer to taking CFS if and when it can be awarded.

- **Rationale:**

- This helps BPA meet near-term goals through more efficient and effective awards of CFS.

# Cost of CFS Analysis

- **\$1,000 Per MW Study costs**
  - Per MW fee subject to actual cost true-up
  - Workorder for per MW fee will be kept open for 3 years from date of the initial CFS analysis.
- **+ Non-refundable \$50k CFS analysis fee**

# Fees cover

- Evaluation of conditions
- Program management and contract issuance
- Developing new managed paths (operational paths or ATC paths)
- Maintaining an increased number of paths (Operational or ATC)
- Additional resources for managing increase curtailment risks

# Security: Bridge CFS

- Minimum 5-year request
- 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.

## PTP

### 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.

### Duration:

- Security will to be held in place from tendering the Contingent CFS Analysis Agreement, through to the service start date, any applicable deferrals, and during time service is taken and paid for.

## NITS

### 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.

# Security: Reassessment CFS

- Same as Security. Bridge CFS except:
  - 5-year request not required
  - The security term will match term of request, up to 3 years
  - If BPA reassess AND changes the conditions for the worse, customer can withdraw without forfeiting the remaining security obligation

# Security: Obligation

- **PTP Reduction:** Security will be reduced on a straight line bases 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.
- 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.
- TSRs withdrawn following the CFS analysis to meet cumulative demand requirements will be relieved of their security obligations.
- At any choice point in the future state where the customer does not meet the requirements, the customer will be offered Reassessment CFS, if available, so that the customer can complete the originally requested terms to meet their security obligation.

# What we heard: Provide a Path to Transmission Service in the Near Term

- **PPC:**
  - “Ensure that there is an avenue for both NT and PTP customers that are prepared to take service in the next 1-3 years to receive interim service.”
- **Brookfield:**
  - “Brookfield Renewable believes that it is imperative to meet the region’s clean-energy and capacity goals and needs to un-pause the existing queue and process commercially viable and ready transmission queue requests.”
- **NIPPC/RNW:**
  - “...revolutionary action is necessary for BPA to support customers and the region in meeting clean energy and reliability timelines...”
- **PacifiCorp:**
  - “PacifiCorp and other utilities in the region depend on BPA to manage, plan, and develop needed transmission pathways to enable the utilities to meet carbon compliance programs in Oregon and Washington, as well as support customer load growth in the region.”

# What we heard: Get off pause

- **Brookfield:**
  - “...in 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.”
- **NewSun:**
  - “NSET’s recommendation is to focus on beginning to process the queue once again.”
- **PGE:**
  - “PGE believes the highest priority should be restoring access to transmission service as quickly and efficiently as possible while longer-term proactive planning reforms are implemented but start on proactive planning now.”
- **Powerex:**
  - “Powerex supports the broader objective of restarting the queue as quickly as possible while minimizing unintended consequences.”
- **PPC:**
  - “...BPA’s planning ‘pause’ has real impacts for PPC members and other customers with near-term transmission needs.”

# Products Customer Feedback (IS-POPT)

CFS for PTP and NITS Customers was widely supported in the feedback, although there were some dissenting opinions about allowing CFS for NITS Customers.

Customers had different opinions about how much CFS should be offered that ranged from maintaining current product reliability to offering as much as possible (IS-POPT-ALT-8).

- **Powerex:**

“...awards of interim service should not be unlimited, but instead evaluated and constrained based on a reasonable expectation of system availability and associated technical considerations to preserve system reliability, even in the absence of a completed study”

“Introducing large volumes of unstudied interim CFS risks diluting congestion revenues attributable to firm rights and weakening the alignment between congestion rents and reservations for firm and conditional firm service...”

- **PGE:**

“PGE encourages BPA to recalibrate the Conditional Firm construct by offering a more clearly differentiated, more curtailable interim service product and deploying improved operational tools to manage congestion when it arises, in queue order.”

- **Avangrid:**

“Avangrid would encourage Bonneville to set the system conditions or max number of hours and limit the number of offers granted so that the new service is likely to enjoy the same quality of service as the current CF product.”

# Staff Leaning: Product Options (IS-POPT)

## Alternatives

- **IS-POPT-ALT-1:** Seasonal Firm NITS
- **IS-POPT-ALT-2:** Long Term 6-NN
- **IS-POPT-ALT-3:** NITS LT 6-NN and PTP LT Priority 5 Non-Firm Service
- **IS-POPT-ALT-4:** CFS - PTP vs NITS
  - **IS-POPT-ALT-4-SUB-A:** PTP CFS
  - **IS-POPT-ALT-4-SUB-B:** NITS CFS
  - **IS-POPT-ALT-4-SUB-C:** NITS Customer PTP Bridge CFS with NITS Firm Option
- **IS-POPT-ALT-5:** CF on the BPA Network
  - **IS-POPT-ALT-5-SUB-A:** for Ready PTP TSRs
  - **IS-POPT-ALT-5-SUB-B:** for Ready NITS F/TSRs
  - **IS-POPT-ALT-5-SUB-C:** Offer CF on the BPA Network to Ready NITS F/TSRs under NITS Customer PTP Agreement with NITS Firm Option
- **IS-POPT-ALT-6:** Planning Redispatch
- **IS-POPT-ALT-7:** Firming up 6-NN in ST
- **IS-POPT-ALT-8:** Increased Operations Constraint Management
  - **IS-POPT-ALT-8-SUB-A:** Increased PTP CFS Offering through Operations Constraint Management
  - **IS-POPT-ALT-8-SUB-B:** Increased NITS CFS Offering through Operations Constraint Management
  - **IS-POPT-ALT-8-SUB-C:** NITS CFS Offering under NITS Customer PTP Agreement with NITS Firm Option
- **IS-POPT-ALT-9:** Allow Mid-Term Offers not Subject to a Sub-grid Check

## Customer Support

- IS-POPT-ALT-4-SUB-A: PTP CFS
- IS-POPT-ALT-4-SUB-C: NITS Customer PTP Bridge CFS with NITS Firm Option
- **IS-POPT-ALT-5-SUB-A:** for Ready PTP TSRs
- **IS-POPT-ALT-5-SUB-B:** for Ready NITS F/TSRs
- IS-POPT-ALT-5-SUB-C: Offer CF on the BPA Network to Ready NITS F/TSRs under NITS Customer PTP Agreement with NITS Firm Option

## Staff Leanings

- **IS-POPT-ALT-5-SUB-A:** for Ready PTP TSRs
- **IS-POPT-ALT-5-SUB-B:** for Ready NITS F/TSRs
- **IS-POPT-ALT-8-SUB-A:** Increased PTP CFS Offering through Operations Constraint Management
- **IS-POPT-ALT-8-SUB-B:** Increased NITS CFS Offering through Operations Constraint Management
- **IS-POPT-ALT-9:** Allow Mid-Term Offers not Subject to a Sub-grid Check

# Conditional Firm Service (CFS)

- Awards of service that include roll-over rights will function much like Bridge CFS today
  - This means that the request will bridge service needs to firm service in the future state.
- Awards of service that do not include roll-over rights will be Reassessment CFS
- Both CFS for PTP and NITS may receive short-term firm ups and are accessed the same
- The interim study process for CFS is an assessment that will identify constraints, but not a plan of service until a commercial study in the future state.
- Study findings will help the CFS study team determine whether/how/when the constraints can be managed.

# Product Options (IS-POPT) Staff Leaning

- **Staff Leaning**

- Offer CF on the BPA Network to Ready PTP TSRs (IS-POPT-SUB-5A)
- Offer CF on the BPA Network to Ready NITS F/TSRs (IS-POPT-SUB-5B)
  - Leaning helps meet regional goals and get off pause, by focusing service offers to near term resources.

- **Rationale**

- Conditional Firm Service provides the tools for congestion management when a mitigation path can be identified. Other proposed alternatives did not address this need, which would have prevented making offers until much later.
- Focuses on near term regional transmission needs, allowing BPA to ease into more CFS on the system and assess additional system capability over time.

# Why NITS CFS vs PTP CFS for NITS?

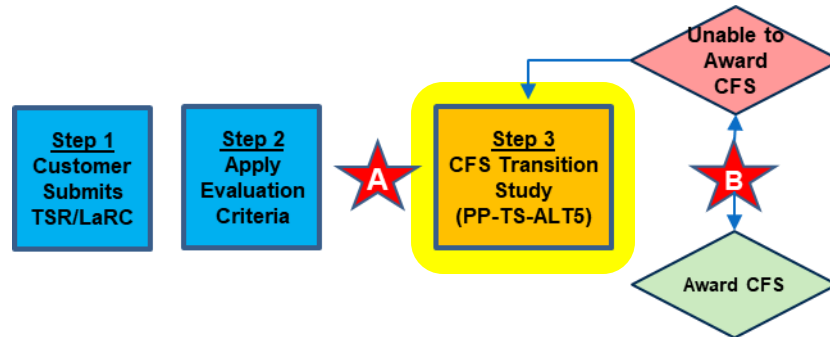
- We heard from NITS customers in the Jan. 15 workshop that a key principle that they are seeking is not to pay both billing determinants for the same load.
  - “NT Customers should have equal access to CFS and should not be required to pay both NT and PTP rates to obtain this service,” Columbia River PUD.
  - Upon further research, BPA determined it cannot guarantee that customers would not need to pay both NITS and PTP rates
  - BPA also recognized that customers taking PTP service for multiple resources need to pay for each leg of transmission

# Customer Off-ramps

- Evaluation Criteria Validation
- Upon Tendering the Contingent CFS Analysis Agreement
- 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.
- At any choice point in the future state where the customer does not meet the requirements, the customer will be offered Reassessment CFS, if available, so that the customer can complete the originally requested terms to meet their security obligation.



# Step 3 CFS Transition Study



# Staff Leaning: Structuring the Queue for Study (QM-SQS)

## QM-SQS Structuring the queue for study

- **QM-SQS-ALT-1:** No Transition Study
- **QM-SQS-ALT-2:** Batch Studies
  - **SUB-A:** Queue order
  - **SUB-B:** Geographic
  - **SUB-C:** POR/POD
  - **SUB-D:** LSE vs. Non-LSE
  - **SUB-E:** NITS vs. PTP
  - **SUB-F:** Resource/Load maturity
  - **SUB-G:** Options
- **QM-SQS-ALT-3:** Cap the LTF Queue



## Customer Support

- **QM-SQS-ALT-2-SUB-A:** Queue order



## Staff Leanings

- **QM-SQS-ALT-2-SUB-A:** Queue order

# Structuring the Queue for Study (QM-SQS)

- Queue order QM-SQS-ALT-2-SUB-A: Process requests in queue order without using batching.
- **Rationale**
  - This set of alternatives was developed presuming there would be a study during the transition that resulted in a complete plan of service.
    - Adopting PP-TS-ALT-5 Study to Resolve Interim Service Ineligibility positions BPA to make the most offerable requests first.
    - Establishing source maturity as Online, Late Stage, and Bypass (EC-SM-ALT-1) will structure the queue.
    - With these approaches BPA is not likely to need a unique batching structure.

# What We Heard: Expedite Proactive Planning

- **NRU**

- “Moreover, we urge BPA to minimize the duration of any transition phase, with the clear objective of accelerating the implementation of Proactive Planning as much as possible.”

- **PPC**

- “While we understand that the details of proactive planning are out of scope for TC-27, the decisions made in TC-27 will directly affect when BPA can begin developing and implementing a future proactive planning process and whether a pilot proactive planning process can be used. PPC would also like to explore with BPA what commitments can be made in the TC-27 process with regards to the proactive planning process (e.g. principles, timing, etc.) to give customers some level of certainty about the future, which could inform some of their positions in the TC-27 case. Specifically, BPA should ensure Load Serving Entities (including PPC members) that they will have an effective path to have their transmission needs met through the future proactive planning paradigm.”

- **Brookfield Renewable**

- “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).”

- **NewSun Energy**

- “As the proactive planning process develops, it will create additional slack in the system and enable BPA to study larger batches, with the goal of ultimately having enough projects in the long-term proactive planning pipeline so that each iteration of the commercial study can study all requests pending at that time.”
- “BPA to immediately begin conducting an initial pilot of the new long-term proactive planning methodology by looking at how much volume can be supported by the Grid Expansion and Reinforcement Portfolio (“GERP”) 1.0 and 2.0 projects, reviewing projects already studied, and using the current queue and past TSEP 2023 study as a guide for planning the next phase of transmission projects (“GERP 3.0”) to support regional needs.”

# What We Heard: Study to Resolve Interim Service Ineligibility

- **Tacoma Power**

- “Tacoma does not support any of the options under Transition Studies, although it is neutral on two of the options. Tacoma needs to understand better how subgrid issues are addressed and what the timeline for the Future State Process is, especially if the majority of stakeholders opt to wait for the Future State.”

- **Brookfield Renewable**

- “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.”

- **TransAlta**

- “Chosen assuming this maximizes conditional firm service awards earliest”

# What We Heard: Other Alternatives

- **NewSun Energy**

- “...once the initial pilot proactive planning study discussed above is complete, BPA would then conduct a full commercial study by starting with the next batch in queue order to develop plans of service for all TSRs in that batch (this is a variation on alternative PP-TS-ALT-4).”

- **Brookfield Renewable**

- “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. A.”

- **PPC**

- “PPC is supportive of moving forward with a combination of a proactive planning process and an at least partial processing of the remaining queue. PPTS alternatives 3, 4 or a hybrid alternative of 8 are most attractive currently, but additional information is needed. ”

# Staff Leaning: Transition Studies (PP-TS)

## Alternatives

- **PP-TS-ALT-1:** Main Grid SIS, with Full POS After SIS Decision Point
- **PP-TS-ALT-2:** Full SIS with Decision Point, prior to full POS
- **PP-TS-ALT-3:** Long-Term Planning Study + Partial Commercial Study
- **PP-TS-ALT-4:** Long-Term Planning Study + Full Commercial Study
- **PP-TS-ALT-5:** Study to Resolve Interim Service Ineligibility
- **PP-TS-ALT-6:** Distribution Factors
- **PP-TS-ALT-7:** 10- & 20-Year Transition Study
- **PP-TS-ALT-8:** Wait for Future State Process



## Customer Support

- **PP-TS-ALT-8:** Wait for Future State Process
- **PP-TS-ALT-5:** Study to Resolve Interim Service Ineligibility
- **PP-TS-ALT-4:** Long-Term Planning Study + Full Commercial Study
- **PP-TS-ALT-3:** Long-Term Planning Study + Partial Commercial Study
- **PP-TS-ALT-2:** Full SIS with Decision Point, prior to full POS



## Staff Leanings

- **PP-TS-ALT-5:** Study to Resolve Interim Service Ineligibility

# Transition Studies (PP-TS) Staff Leaning

- **Staff Leaning**
  - Study to Resolve Interim Service Ineligibility (PP-TS-ALT-5)
- **Rationale**
  - Enables BPA to get off pause by granting offers of interim service
  - Increase customer access to transmission service by expanding eligibility for interim service

# Transition Study Process

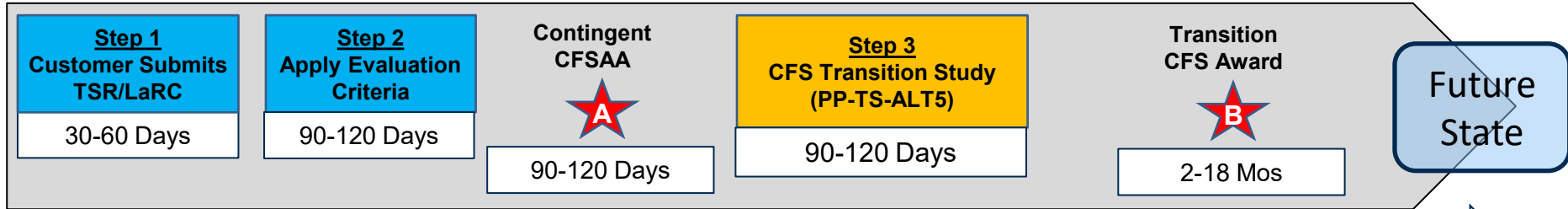
- **Objective**

- Conduct an analysis of BPA's ability to reliably provide additional Conditional Firm service for Customers ready to take service.
  - The interim study process for CFS is an analysis in which BPA will identify constraints, but not a plan of service at this time.
  - Analysis findings will help the CFS study team determine whether/how/when the constraints can be managed.

- **Analysis Overview**

- Identify constraints
- Identify available paths or mitigations needed
- Identify system limits needed to manage the paths
- Conduct Transition Study – formally apply to the queue
- Develop responses for individual requests
  - Award of CFS
  - Not Awardable at this time

# Path to Transitional CFS Award: Process



*\*TSRs that require new operational paths will not be awardable until operational constraint management on that path is in effect. As soon as new paths are identified BPA will initiate the new operational constraint process*

## Operationalizing Constraint Management\*

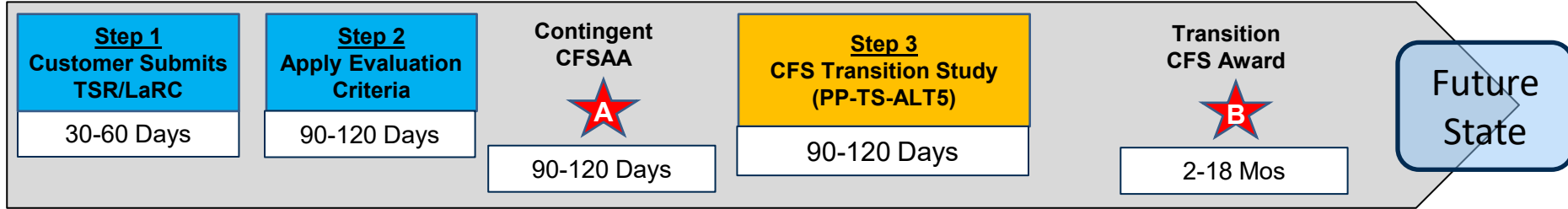
- Identify available paths or mitigations needed
- Identify system limits needed to manage paths
- Schedule Granularity
- Development of new operational paths\* (12-18 months to manage paths)
- Formally apply constraints/mitigations to the queue
- Develop responses to each TSR

*\*\* Awards will be made in an iterative process based on service commencement and operational management. As a reminder, BPA expects not all studied TSRs to be awardable (see main process visual)*

## Iterations of Awards\*\*

- Awards on or before 18 months of requested service state date
- Initially awardable (existing controls)
- Implementation of constraint management changes (new controls)
- Expansion project energization

# Conceptual Path to Transitional CFS Award: Timing



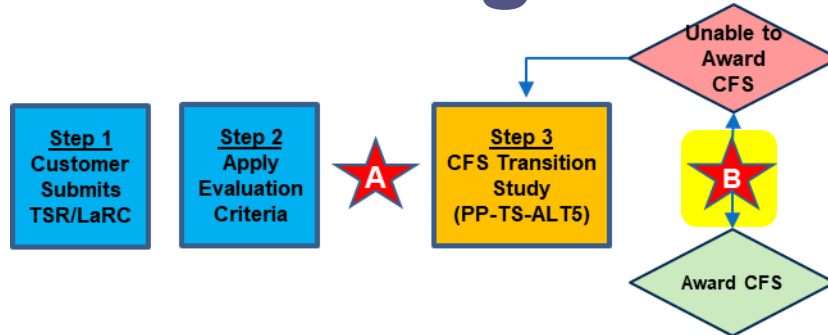
Estimated Timelines	Step 1	Step 2	Star A	Step 3	Star B	Duration
Timing I:	30 Days	90 Days	90 Days	90 Days	2 mos	12 mos to award
Timing II:	30 Days	90 Days	90 Days	90 Days	12 mos	22 mos to award
Timing III:	60 Days	120 Days	120 Days	120 Days	18 mos	32 mos to award

**Note:** These timelines only apply to TSRs with near term service commencement dates. For example, these timelines would NOT apply to a TSR with a service commencement of 2030 or later.



# Star B

## *Awarding CFS*



# 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 award CFS in the contingent offer up to the maximum cited capability of the resource.
- Customers are obligated to withdraw the remaining requests (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 analysis will be removed from the queue.

# RAS Resource (EC-RAS) Staff Leaning

- **Staff Leaning**

- Originally, this topic was considered as a potential (F)TSR validation requirement. However, under this proposal, the RAS requirement is not applicable when the customer submits an application (Step 1 of the Business Model) or the application is validated against Evaluation Criteria requirements (Step 2 of the Business Model).
- Instead, the proposal related to RAS is for CFS only – For (F)TSRs for which the CFS team determines that RAS required, BPA will not make an award of CFS unless/until RAS is enabled.
- Start date of CFS will be tied to energization of the needed RAS (or requested start date, if later).
- RAS requirements for (F)TSR to remain valid over time remain to be defined. Some paths have a known RAS requirement. In other instances, RAS requirements may be unknown at time of (F)TSR submission and identified later through study process. Therefore, requiring RAS resource identification upon submittal of the (F)TSR would not always be viable.

# RAS Resource Requirements (EC-RAS)

## Clarifications

- This issue does not involve arming load to enable increased use of the transmission system.
- When relevant, identification of the need for a resource available to provide RAS is part of the plan of service. BPA defines the plan of service – it isn't a finding that can be negated or negotiated.
- When required, long-term firm transmission cannot be provided until/unless there is a resource supplying RAS. It is important to note that when a RAS resource is relevant, BPA expects that CFS also requires implementation of the RAS capability.
- RAS needs are typically identified through the study process, although RAS need is well-known for some paths due to previous studies. For CFS, BPA CFS analysis team will assess need for RAS.

## General Theme

Provide flexibility, late in project development, or not at all.

- **Powerex**
  - "...suggests an approach that allows for flexible timing in identifying RAS, as appropriate, and that reflects differences in project characteristics."
- **SCL**
  - "...building additional capacity across either the Cross Cascades North or South Paths would be preferable to SCL than providing RAS resources to enable TSRs in the long term."
- **Avangrid**
  - "Avangrid does not necessarily oppose imposing RAS requirements."
- **PSE**
  - "PSE also calls into question whether BPA can require a RAS for resource outside of its BAA if Generation Interconnection Studies do not identify BPA as an Affected System."
- **Brookfield Renewable**
  - "Require prior to decision to build the relevant project(s)."

# Staff Leaning: RAS Resource (EC-RAS)

## RAS Resource Previous Alternatives

- **EC-RAS-ALT-1:** Require upon TSR/FTSR submittal
- **EC-RAS-ALT-2:** Require prior to preliminary engineering
- **EC-RAS-ALT-3:** Require prior to environmental study
- **EC-RAS-ALT-4:** Require prior to decision to build the relevant project(s)
- **EC-RAS-ALT-5:** Provide timing flexibility for resource specification, but customer contractually obligated to pay for the service upon project completion regardless of ability to utilize the service

## RAS Resource New Alternative

- **EC-RAS-ALT-6:** If needed, RAS Resource is required for CFS; Address timing requirements for RAS resource re: plan of service in future

## Customer Support

- **EC-RAS-ALT-3:** Require prior to environmental study
- **EC-RAS-ALT-4:** Require prior to decision to build the relevant project(s)

## Staff Leanings

- **New: EC-RAS-ALT-6:** FOR CFS ONLY (Timing requirement for RAS resource to be addressed later)
- For TSRs for which the CFS team determines that RAS is required, BPA will not make an award of CFS unless/until RAS is enabled (and assuming CFS is otherwise enabled for the (F)TSR).

**New  
Alternative**

**Overlap**

# Awarding CFS

- To receive a CFS Award:
  - Start Date must be within 18 months (IS-POPT-SUB-5A & -SUB-B)
- Increased Operations Constraint Management (IS-PO-ALT-8-SUB-A & -SUB-B)
  - Leaning means that BPA will revisit paths that were previously ineligible with a fresh eye and find areas where increased risk may be acceptable.
- Allow Mid-Term Offers without Subgrid (IS-PO-ALT-9)
  - Allows additional offer options that may work when longer term options are not yet a possibility
  - Reduces operational risk since the requests have a limited duration

# Staff Leaning: Curtailment Type (IS-CT)

## Alternatives

### IS-CT

- **IS-CT-ALT-1:** Systems conditions only.
- **IS-CT-ALT-2:** Systems conditions and/or x% number of 8760 hours of the year.
- **IS-CT-ALT-3:** System conditions or 8760 number of hours



## Customer Support

### IS-CT

- **IS-CT-ALT-2:** Systems conditions and/or x% number of 8760 hours of the year.



## Staff Leanings

### IS-CT

- **IS-CT-ALT-1:** Systems conditions only.

# Curtailment Type (IS-CT) Staff Leanings

- **Staff Leaning**
  - System Conditions Only (IS-CT-ALT-1)
- **Rationale**
  - This is the most common finding for CFS conditions due to lack of historical flow data for subgrid area.

## **Deferral (17.7 Extension of Service Period)**

- One deferral up to one year

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

Under this approach BPA and its Customers may be accepting additional risk by accepting more service offers managed through curtailment.

- Essentially, we will be reviewing known constraints from past studies and in the transition study to see if additional awards are possible.
  - For example: Management of Portland, Northwest Washington, and Longhorn/McNary areas through existing and/or future paths.
    - Does not mean unlimited as system reliability must be a consideration
  - Subgrid or 3<sup>rd</sup> party constraints that impair the reliability of the system must still be manageable or the request would be ineligible for CFS at that snapshot in time.
  - 1-1 Constraints with seams issues would need further study and coordination.

### Rationale

- This leaning looks at offering as much CFS as possible
- Provides the opportunity for customers to receive early access for a CFS offer.
- Requests would be offered interim CFS provided conditions could be managed.

This alternative will require additional operational workload in and likely additional full-time employees, which may pose limitations.

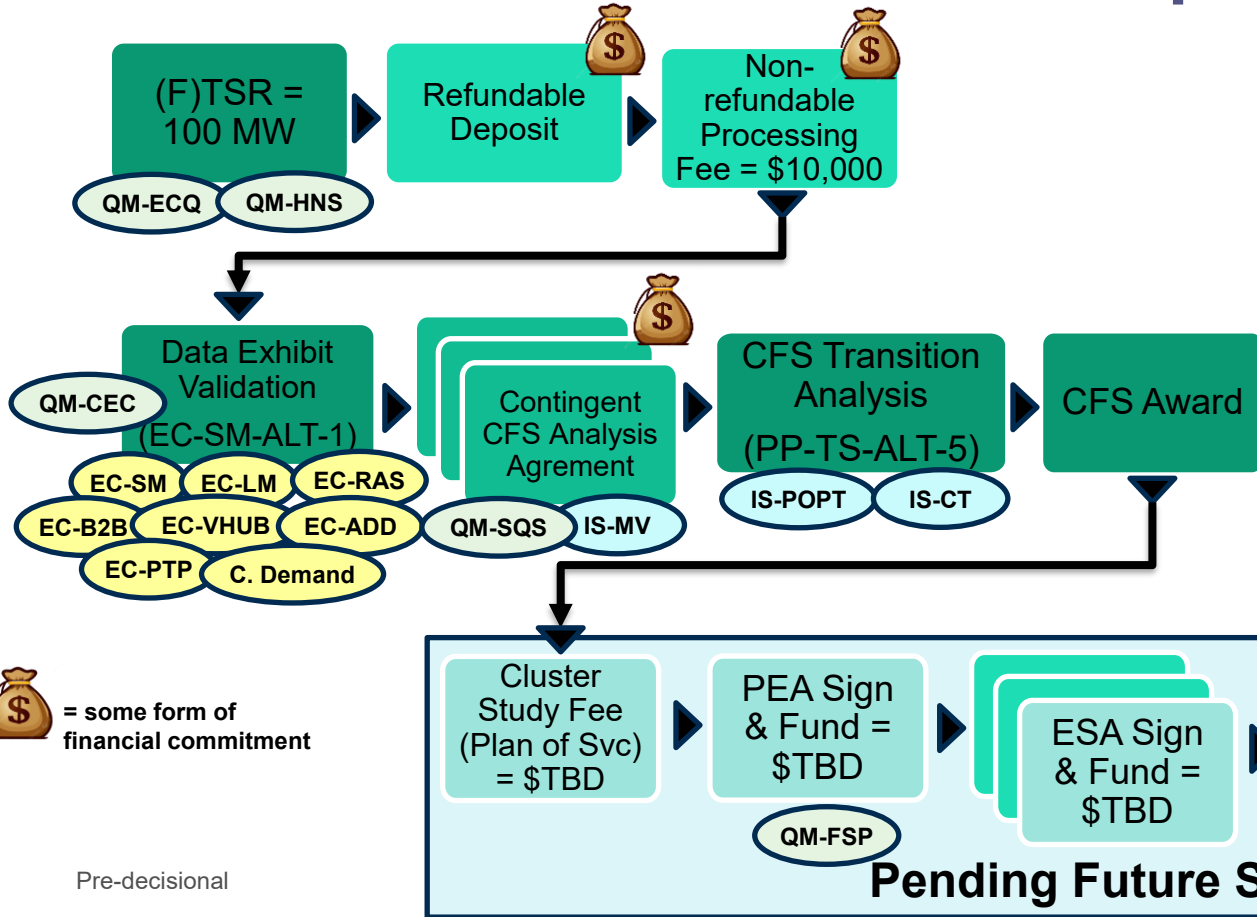
## Allow Mid-Term Offers w/o Subgrid Check (IS-POPT-ALT-9)

- Increased offering through Operations Constraint Management
- Requirements:
  - Service Commencement Date must be less than or equal to 24 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:
  - 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.
    - While our previous proposal was that TSRs would receive a Bridge CFS offer for front end, this method is less administrative and not subject to reassessment as offers are no more than 2 years.

### Rationale

Adds another tool for customers to obtain service in the transition period while removing subgrid as an obstacle.

# LTF Tx Transition Process Example



**For Each (F)TSR**

Source (100 MW (F)TSR)	Amount
PTP Deposit	\$204,300
NITS Deposit	\$239,900
Processing Fee	\$10,000
CFS Analysis Fee	\$150,000
PTP Security	\$8,636,400
NITS Security	\$7,354,800
Plan of Svc CS Fee	\$TBD
PEA Funding (Per Project)	\$TBD
ESA Funding (Per Project)	\$TBD
Construction Securitization (Per Project x # of years)	\$TBD

EC-MCAP (Max Start Date)  
EC-PV (Adv. Fund.)

= some form of financial commitment



# Other Items



# Conversion to Long-term Firm

- PTP Customer
  - Upon energization of the plan of service following execution of a Contingent or LTF offer.
- NITS Customer
  - Upon energization of the plan of service following execution of a Contingent or LTF offer and completion of the DNR process.

# Processing TSRs with *De Minimis* Impacts

- Customer feedback:
  - PTP customers strongly support resuming processing of TSRs with *de minimis* impacts
  - Two NITS customer groups were not opposed if BPA also resumed processing NITS forecasts
  - No customers filed comments in opposition
- BPA has determined to resume processing of TSRs with *de minimis* impacts (new and redirect,) with limits on redirects, and NITS forecasts on the same timeline.

## Staff Leaning: Firm Service Prioritization (QM-FSP)

### Alternatives

#### QM-FSP (Firm Service Prioritization)

- QM-FSP-ALT-1: Status Quo
- QM-FSP-ALT-2: Prioritizing Service Readiness
- QM-FSP-ALT-3: First Right of Refusal



### Customer Support

#### QM-FSP (Firm Service Prioritization)

- QM-FSP-ALT-1: Status Quo



### Staff Leanings

#### QM-FSP (Firm Service Prioritization)

- QM-FSP-ALT-1: Status Quo

# Establishing Service Readiness Access to Capacity (QM-FSP)

- Applies after a study for a plan of service (in the future state)
- **Staff Leaning**
  - Status Quo (QM-FSP-ALT-1)
- **Rationale**
  - Supported by Customers
  - Aligns with foundational FERC pro forma principles
  - Consistent with BPA's TC-27 principals ([October 10 workshop, slide 4](#)).

# Individual Studies

- Individual studies will be opened for request after completion of the first commercial study following implementation of Proactive Planning.



# Next Steps



**TC-27 Alternatives Selection  
March 18-19, 2026**

## TC-27 Alternatives | March 18-19, 2026

### Evaluation Criteria (EC)

Ranking			Alternative Code	Description	Comments
Like	Okay	Dislike	Source Maturity (EC-SM)		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-1	For transition, only accept GIs that are late stage or bypass	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-2	LGIA executed	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-3	Issuance of the GI Facilities Study Report	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-4	Completion of GI Phase Two Cluster Study	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-5	Completion of GI Phase One Cluster Study AND Execution of GI Phase Two Cluster Study Agreement	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-6	Completion of Phase One of the GI study plus any needed restudy	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-7	Completion of Phase One GI study report	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-8	Completion of Phase One of the GI study	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-9	Consultant GI Study	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-10	Minimal GI Criteria	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-SM-ALT-11	Incent LSE Engagement by Providing POR Flexibility	

## TC-27 Alternatives | March 18-19, 2026

Like	Okay	Dislike	Load Maturity (EC-LM)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-LM-ALT-1	Must be in execution phase (agreements signed/funded)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-LM-ALT-2	Facilities Study required to be completed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-LM-ALT-3	System Impact Study required to be started or completed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-LM-ALT-4	Feasibility Study required to be completed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-LM-ALT-5	LLIR must be submitted, but no study required
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-LM-ALT-6	No requirement for LLIR submittal
Like	Okay	Dislike	RAS Resource (EC-RAS)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-RAS-ALT-1	Require upon TSR/FISR submittal
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-RAS-ALT-2	Require prior to preliminary engineering
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-RAS-ALT-3	Require prior to environmental study
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-RAS-ALT-4	Require prior to decision to build the relevant project(s)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-RAS-ALT-5	Provide timing flexibility for resource specification, but customer contractually obligated to pay for the service upon project completion regardless of ability to utilize the service
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-RAS-ALT-6	If needed, RAS Resource is required for CFS; Address timing requirements for RAS resource re: plan of service in future
Like	Okay	Dislike	Requirements for Gen/Load Outside of the BPA Balancing Authority Area (EC-OB)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A

## TC-27 Alternatives | March 18-19, 2026

Like	Okay	Dislike	PTP requests to NT PODs (EC-PTP)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PTP-ALT-1	Require demonstration of interest from NITS customer upon submittal
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PTP-ALT-2	Require demonstration prior to execution of contract
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PTP-ALT-3	Only NITS Customers Allow to Submit PTP TSRs to serve their load
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PTP-ALT-4	Status Quo
Like	Okay	Dislike	Battery-to-Battery (EC-B2B)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-B2B-ALT-1	Disallow battery-to-battery LTF F/TSRs
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-B2B-ALT-2	Allow battery-to-battery F/TSRs if Customer can provide reasonable scenarios
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-B2B-ALT-3	Allow LTF battery-to-battery F/TSRs
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-B2B-ALT-4	Disallow any TSR for which battery is cited as stand-alone load; Develop a policy to address viability of LTF transmission as stand-alone load prior to allowing such TSRs into the LTF transmission queue
Like	Okay	Dislike	Additional Information (EC-ADD)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-ADD-ALT-1	Modify section 17.2(x) and 29.2(ix) to read "Attachment K and other BPA transmission planning processes"
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-ADD-ALT-2	Use existing language in 17.2(x) and 29.2 (ix) Any additional information required by the Transmission Provider's planning processes established in Attachment K

## TC-27 Alternatives | March 18-19, 2026

Like	Okay	Dislike	Virtual Hubs   Mid-C and NW Market Hub (EC-VHUB)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>EC-VHUB-ALT-1</b>	Remove Mid-C Remote only - see Sub-Alternatives (SUB)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>EC-VHUB-ALT-1-SUB-A</i>	Remove Mid-C Remote Only
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>EC-VHUB-ALT-1-SUB-B</i>	Conform to NW Hub
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-2	Offer Reassessment Only
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-3	Mix of Firm and CF
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-4	Remove both from the LFT market
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-5	Require TSR pairing at NW Hub
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-6	Actively support LFT use of NW Hub
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-VHUB-ALT-7	Status Quo

## TC-27 Alternatives | March 18-19, 2026

Like	Okay	Dislike	Delivering/Receiving Party Validation (EC-PV)		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-1	Require confirmation of Delivering/Receiving Party; if not remove from queue	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-2	Utilize contingent validation; remove from queue if deal not executed	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-3	If unable to provide required bilateral demonstration, provide only Reassessment CFS or Interim Service	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-4	Allow financial demonstration in lieu of required bilateral demonstration; if not provided remove from queue	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-5	Require FERC marketer registration if no bilateral demonstration; if not remove from queue	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-6	Short-term market only if bilateral demonstration unavailable; remove from (LTF) queue	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-7	Only Offer Up to 4 years, 11 months	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-8	Use points system for validation	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-9	Contingent Validation with Financial Option to Retain TSR	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-10	Allow a Dispute Mechanism – Only request verification when another party suggests that the information was incorrectly supplied	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-11	Status Quo, take information at face value without any further validation or confirmation	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-PV-ALT-12	For F/TSRs citing a generation source physically connected to BPA's network, and for which the submitting party is not the source owner or an affiliate, validate use of the TSR to transmit the cited source generation	
Like	Okay	Dislike	Minimum Cap Requirements (EC-MCAP)		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-MCAP-ALT-1	Minimum capitalization requirement scaled based on level of transmission service request activity in study.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-MCAP-ALT-2	Flat minimum capitalization requirement regardless of level of transmission service request activity in study.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EC-MCAP-ALT-3	Status Quo – do not have a minimum capitalization requirement.	

## TC-27 Alternatives | March 18-19, 2026

Interim Service (IS)					
Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	<b>Product Options (IS-POPT)</b>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-1	Seasonal Firm NITS	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-2	Long Term 6-NN	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-3	NITS LT 6-NN and PTP LT Priority 5 Non-Firm Service	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-4	CFS - PTP vs NITS - <b>see Sub-Alternatives (SUB)</b>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>IS-POPT-ALT-4-SUB-A</i>	PTP CFS	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>IS-POPT-ALT-4-SUB-B</i>	NITS CFS	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-5	CF on the BPA Network - <b>see Sub-Alternatives (SUB)</b>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>IS-POPT-ALT-5-SUB-A</i>	for Ready PTP TSRs	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>IS-POPT-ALT-5-SUB-B</i>	for Ready NITS F/TSRs	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-6	Planning Redispatch	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-7	Firming up 6-NN in ST	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-8	Increased Operations Constraint Management	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>IS-POPT-ALT-8-SUB-A</i>	Increased PTP CFS Offering through Operations Constraint Management	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>IS-POPT-ALT-8-SUB-B</i>	Increased NITS CFS Offering through Operations Constraint Management	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>IS-POPT-ALT-8-SUB-C</i>	NITS CFS Offering under NITS Customer PTP Agreement with NITS Firm Option	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-POPT-ALT-9	Allow Mid-Term Offers not Subject to a Sub-grid Check	
Like	Okay	Dislike	<b>Mandatory-Voluntary (IS-MV)</b>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-MV-ALT-1	Mandatory for early access	

## TC-27 Alternatives | March 18-19, 2026

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-MV-ALT-2	Not mandatory until POS has been developed	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-MV-ALT-3	Status Quo - Not Mandatory	
Like	Okay	Dislike	<b>Curtailment Type (IS-CT)</b>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-CT-ALT-1	Systems conditions only.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	IS-CT-ALT-2	System condition and/or x% number of 8760 hours of the year.	

## TC-27 Alternatives | March 18-19, 2026

### Queue Management (QM)

Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	<b>Applying Evaluation Criteria to the Queue (QM-ECQ)</b>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-ECQ-ALT-1	Keep existing queue.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-ECQ-ALT-2	Empty existing queue.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-ECQ-ALT-3	Apply the new requirements through an agreement.	
Like	Okay	Dislike	<b>Collecting New Evaluation Criteria (QM-CEC)</b>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-CEC-ALT-1	Start where we are.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-CEC-ALT-2	Customers submit a new data form.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-CEC-ALT-3	Combine ALT-1 and ALT-2	
Like	Okay	Dislike	<b>Structuring the Queue for Study (QM-SQS)</b>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-1	No Transition Study	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2	Batch Studies - <b>see Sub-Alternatives (SUB)</b>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-A	Queue order	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-B	Geographic	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-C	POR/POD	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-D	LSE vs. Non-LSE	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-E	NITS vs. PTP	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-F	Resource/Load maturity	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-2-SUB-G	Options	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-SQS-ALT-3	Cap the LTF Queue	

## TC-27 Alternatives | March 18-19, 2026

Like	Okay	Dislike	Handling New (F)TSR Submissions (QM-HNS)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-HNS-ALT-1	Decline All (F)TSRs submitted after 12pm 8/15/24
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-HNS-ALT-2	Study (F)TSRs in Proactive Planning Program (Future State)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-HNS-ALT-3	Include in 2025 TSEP CS Group
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-HNS-ALT-4	Second Transition Study
Like	Okay	Dislike	Firm Service Prioritization (QM-FSP)	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-FSP-ALT-1	Status Quo
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-FSP-ALT-2	Prioritizing Service Readiness
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	QM-FSP-ALT-3	First Right of Refusal

## TC-27 Alternatives | March 18-19, 2026

### Proactive Planning (PP)

Ranking			Alternative Code	Description	Notes
Like	Okay	Dislike	<b>Transition Studies (PP-TS)</b>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-1	Main Grid SIS, with Full POS After SIS Decision Point	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-2	Full SIS with Decision Point, prior to full POS	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-3	Long-Term Planning Study + Partial Commercial Study	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-4	Long-Term Planning Study + Full Commercial Study	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-5	Study to Resolve Interim Service Ineligibility	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-6	Distribution Factors	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-7	10- & 20-Year Transition Study	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	PP-TS-ALT-8	Wait for Future State Process	