

Submitted to [techforum@bpa.gov](mailto:techforum@bpa.gov) on April 10, 2026

**RE: PPC Comments on BPA’s March TC-27 Workshop and Upcoming Settlement Effort**

The Public Power Council (PPC)<sup>1</sup> is supportive of BPA’s efforts to improve its planning policies to be more responsive to customer needs which will allow utilities to facilitate regional economic growth in their communities and enable compliance with state policies. We are optimistic that a reenvisioned “future state” planning process will be able to achieve these goals. PPC acknowledges the transition state that is the focus of TC-27 is necessary; however, this process will not result in the type of transformative changes that BPA has committed to pursuing and is not designed to result in the creation of substantial new infrastructure to serve future needs. For that reason, we continue to recommend that BPA work quickly to resolve the TC-27 process and begin working with customers to develop and implement a reformed transmission planning “future state” as soon as possible.

With this in mind, we appreciate BPA’s stated intent to explore a TC-27 settlement. A settled TC-27 would allow BPA and its customers to turn our collective attention to much-needed, longer-term, transformative changes to modernize the agency’s processes so that it can better respond to the region’s growing transmission needs. At the same time, for PPC members to support a proposed settlement, it must be clear, provide predictability for customers, and meet specific objectives.

***Setting Up TC-27 For Success***

As we move from informal workshops to either the formal TC-27 proceeding or settlement discussions, BPA will need to be abundantly clear about its proposals. To date, there has been significant confusion about some of BPA’s proposals based on the information presented. In some cases, to provide a sufficient level of clarity, BPA may

---

<sup>1</sup> PPC is the umbrella trade association representing the interest of the Northwest’s non-profit, public power utilities that have preference rights to the output of the federal system. PPC’s members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC’s members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA’s transmission system. The ability to access BPA’s transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

need to develop and share draft business practice language. BPA will also need to identify which aspects of its proposal are intended to be temporary or transitional, and which components are intended to be longer-term, durable solutions. This has been discussed verbally at previous workshops, but written transparency on this point will be important in BPA’s future proposals.

***PPC Objectives for the TC-27 Case***

PPC has identified several objectives for the results of the TC-27 case. PPC will evaluate whether BPA’s proposal achieves these objectives in order to determine whether PPC can support a potential settlement. PPC’s objectives for the TC-27 proceeding are:

- Restart processing requests as soon as possible.
- Proceed with proactive planning development and implementation as quickly as practicable.
- Provide some level of assurance that LSEs will have their transmission needs planned for in the proactive planning paradigm.
- 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.

PPC offers the initial thoughts below on areas where BPA’s “staff leanings” as shared at the March workshop should be revised to better meet these objectives.

<b>PPC Settlement Objective</b>	<b>Recommended Changes to BPA Proposal</b>
<b>Restart processing requests as soon as possible.</b>	<ul style="list-style-type: none"> <li>• BPA must provide certainty as to when processing NT forecasts and de minimis and redirect requests will restart.</li> <li>• BPA needs to expedite the posting of the proposed NT business practice (BP). This proposal has been discussed for 2+ years with little change, especially in the last year, which should make a quick posting of draft BP language possible.</li> </ul>
<b>Proceed with proactive planning development and implementation as quickly as practicable.</b>	<ul style="list-style-type: none"> <li>• BPA should commit to a roadmap for standing up proactive planning, including specific dates for pilot programs and the customer engagement process.</li> </ul>
<b>Provide some level of assurance that LSEs will have their transmission needs planned for in the proactive planning paradigm.</b>	<ul style="list-style-type: none"> <li>• BPA should establish principles for its proactive planning process as part of the TC-27 settlement.</li> </ul>

	<ul style="list-style-type: none"> <li>• This should include a principle that the load forecasts for load following entities will be considered in the proactive planning process.</li> </ul>
<p><b>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.</b></p>	<ul style="list-style-type: none"> <li>• Reduce the level of the deposit required related to the CFS agreement. The current proposal is not in line with the costs that are being “secured.” Requiring such large deposits could inadvertently predetermine the type of economic growth enabled in PPC member communities.</li> <li>• A 10-year hold of the CFS deposit is too long, especially if BPA is unable to offer service.</li> <li>• A variety of approaches, such as identifying mid-term CF service, may help meet customer needs, but more information is needed on the likelihood that BPA can develop plans of service in certain constrained areas.</li> <li>• BPA should establish a window allowing customers to convert the type of transmission service they receive (PTP or NT) following the TC-27 proceeding.</li> </ul>

PPC appreciates the opportunity to comment on the TC-27 process. We acknowledge that achieving transformational changes in BPA’s transmission processes is challenging. Bringing TC-27 to a successful conclusion would represent an important milestone in continuing BPA’s larger Grid Access Transformation (GAT) efforts.

Sincerely,  
 Lauren Tenney Denison  
 Chief of Staff and Strategic Initiatives  
 Public Power Council