

January 16, 2026

**Via email:**

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

U.S. Department of Energy  
Bonneville Power Administration  
Transmission Services

**Re: Puget Sound Energy's Comments Relating to Bonneville Power Administration's TC-27 Pre-Proceeding Workshops – December 17-19, 2025 & January 6-7, 2026**

Puget Sound Energy (PSE) appreciates the opportunity to submit these comments in response to the Bonneville Power Administration's (BPA) December 17-18, 2025 & January 6-7, 2026 TC-27 Pre-Proceeding workshops. The comments below are intended to provide feedback on the proposed alternatives and highlight areas where additional clarification would be helpful. An election spreadsheet identifying our preferences across the alternatives proposed by BPA during the workshops is attached and the comments here are intended to offer high level feedback on the key issues reflected in those selections.

**Evaluation Criteria**

BPA has proposed a set of evaluation criteria intended to define what constitutes a "Studiable" Transmission Service Request (TSR).

**Source Maturity**

For a TSR associated with a resource within BPA's Balancing Authority Area (BAA), PSE supports establishing eligibility based on demonstrated interconnection progress, specifically with the completion of Phase One of the Generator Interconnection Cluster Study and execution of Phase Two Cluster Study Agreement. This demonstration would balance BPA's concern regarding maturity of the studied source while avoiding the extended timelines associated with requiring completion of all the phases of interconnection study or execution of a large generator interconnection agreement (LGIA). PSE requests clarification on how these criteria would be

applied to other development scenarios where a transmission customer requests a new TSR to support a generator repower and generator replacement.

For a TSR associated with a resource outside of BPA's BAA, PSE recommends that BPA provide flexibility to customers in providing evidence of transmission transactions to demonstrate how the generation is getting to BPA's point of receipt (POR). Due to the coordination required and differences in requirements among transmission service providers for processing these requests, submitting a TSR on or before the day of the TSR submittal into BPA's queue is likely to pose logistical challenges. PSE seeks clarification regarding the specific status an upstream TSR must reach for BPA to consider it acceptable. It would be helpful for BPA to clarify whether submittal alone is sufficient or whether the request must be in study, accepted or confirmed status.

### **RAS Resource**

BPA proposes to require a Remedial Action Scheme (RAS) for sources originating outside of its BAA. This proposal raises questions concerning scope and timing. It appears to extend beyond what is necessary to support effective transmission planning. PSE recommends that BPA provide analysis-based evidence as to why the RAS is needed rather than having a blanket requirement. Unplanned interruption of service by BPA could result in future resource adequacy issues for PSE. PSE also calls into question whether BPA can require a RAS for resources outside of its BAA if Generation Interconnection Studies do not identify BPA as an Affected System. If BPA requires a RAS for resources outside of their BAA, BPA should define the scenarios in which the RAS would be activated and what resulting curtailment would occur. This information is necessary for PSE to successfully plan and develop its transmission and resource portfolios to service its native load customers.

### **MIDCREMOTE and NWHUB**

PSE supports BPA proposal to have previously studied TSRs with a POR and point of delivery (POD) of NWHUB or MIDCREMOTE receive an award of long-term firm (LTF) transmission after the completion of identified plans of service, and that these previously studied TSRs would not be limited to a reassessment Conditional Firm (CF) award. In addition, PSE would support allowing customers with an unstudied TSR with a POR or POD of MIDCREMOTE to conform their TSR POR/POD to NWHUB. PSE also supports requiring pairing for NWHUB requests, as unpaired requests could distort planning assumptions and plans of service. PSE also requests BPA clarify the minimum information necessary to demonstrate sufficient pairing.

PSE requests that BPA consider whether delivery and planning challenges associated with MIDCREMOTE could be addressed through other evaluations or maturity criteria, rather than through removal of MIDCREMOTE. Additional insight into what volume of transmission service would remain under more stringent evaluation criteria and whether that volume would still pose

challenges to planning process would assist stakeholders in understanding the impacts of this proposal. PSE also supports maintaining the status quo. The proposal that offers Reassessment CF Service or removes both MIDCREMOTE and NWHUB from the LTF market could strand existing and future requests.

In addition to the above changes to BPA's Mid-C policy, PSE recommends that BPA also consider allowing existing BPA transmission customers to use their LTF point-to-point (PTP) transmission with a MIDCREMOTE or NWHUB POR to schedule projects interconnected at BPA substations at MIDCREMOTE. For example, a customer with an existing transmission contract that has a Vantage 230kV Source should be allowed to schedule a generation project that is interconnecting at the BPA Vantage 230kV substation. This would allow customers to leverage their existing transmission rights without needing second wheel of transmission or a redirect.

### **Delivering /Receiving Party Validation**

PSE supports contingent validation of delivering/receiving party with removal from the queue if a deal is not executed. This should address BPA's concern that inaccurate delivering and receiving party information can encumber capacity that could have been utilized by mature requests. Providing a financial mechanism to retain a request under contingent validation could be another option that provides accountability while providing flexibility for commercial negotiation. However, this should be paired with a clear time limit to prevent request from staying in the queue indefinitely. PSE requests clarification on BPA's desired timeline for demonstrating commercial arrangements and how contingent validation timelines will be treated during the transition studies.

### **Interim Service**

### **Product Options**

PSE supports offering CF Service for PTP customers as an interim option as it provides opportunity for customers to receive early access for resource delivery. PSE requests clarification on how BPA intends to implement this interim CF Service relative to the existing long-term CF Service. Specifically, PSE would like to understand whether BPA intends to apply the same eligibility criteria currently used for bridge CF Service, including participation in BPA's plan of service and funding associated studies, or whether different criteria would apply.

BPA's slide deck references 8760 hours per year under bridge CF Service. PSE requests further details on how those would be determined, evaluated, and implemented as this would help us understand operational and commercial risks. Also, PSE would like clarification as to whether BPA's proposal to offer CF service on the BPA network to ready TSRs ("IS-POPT-ALT-5-SUB-A") would apply to point-to-point customers. PSE further requests clarification regarding firmness

of service BPA is contemplating under Alternative IS-PO-ALT-8 and IS-PO-ALT-9 to make an informed recommendation.

### **Mandatory / Voluntary, Curtailment Type**

BPA has previously identified that the Puget Sound region has a sub-grid limitation with a plan of service that is projected to go into service in 2035 (Schultz-Olympia). PSE seeks clarification on how BPA would manage the award of interim service for TSRs delivering to Puget Sound customers before the Schultz-Olympia upgrade has been completed. PSE supports making interim service participation voluntary until a plan of service is developed, as it provides better visibility to the customer regarding their financial obligation and limits exposure. PSE prefers allowing curtailment based on system conditions or defined number of hours of the year as this provides more flexibility than the system conditions only approach. PSE requests clarification on how the number of hours will be determined and how scheduling priority would be applied.

### **Queue Management**

#### **Applying Evaluation Criteria to the Queue, Collecting New Evaluation Criteria**

PSE supports maintaining the existing transmission queue as it preserves prior customers investment, as well as saving time and effort for both BPA and customers. PSE also supports BPA using existing information to the extent possible. Requiring an entirely new data exhibit form could extend the processing timelines and increase resubmission burden. BPA could request additional supplemental information to what has been provided to address data deficiencies.

#### **Structuring the Queue for Study, Handling New TSR Submissions, Firm Service Prioritization**

PSE supports batch studies conducted in queue order as it can provide transparency and predictability. PSE does not support proceeding without a transition study. BPA should include post-August 15, 2024 requests in the 2025 TSEP Cluster Study. Declining all such requests and limiting them to proactive planning or requiring a second transition study would significantly delay access to service, as well as impact the customer resource acquisition process. PSE also supports prioritizing service readiness when awarding transmission service.

### **Proactive Planning**

#### **Transition Studies**

PSE requests clarification and further discussion of the Transition Study (“PP-TS”) alternatives, particularly for the first four alternatives presented:

1. Main Grid SIS, with Full Plan of Service (POS) After SIS Decision Point
2. Full SIS with Decision Point, prior to full POS
3. Long-Term Planning Study and Partial Commercial Study
4. Long-Term Planning Study and Full Commercial Study

Additional details are needed to fully understand how these alternatives will be implemented. PSE requests clarification on how BPA would provide interim service without completion of a commercial study under the first two options. BPA should clearly identify the specific customer commitments associated with each option including study participation requirements, financial obligations and any contractual commitments. PSE would prefer that customers with TSRs that meet the established eligibility threshold and remain in the queue be evaluated for both main grid and sub-grid with interim service where feasible. Continued conversation on these alternatives is needed as additional information and clarification would allow customers to provide more informed recommendations.

### **Commercial Business Model – Future State**

PSE requests clarification regarding the one-year service security requirement. It is not clear whether such service security would be required for a TSR where capacity is available and BPA is able to award the service offer without study, or whether this requirement only applies to requests that receive a contingent service offer. Further, PSE requests BPA clarify how the service security would be treated if a customer elects not to continue with the service. Based on the presented material, it appears that BPA is assuming a rolled-in or embedded rate for contingent service offers, but PSE requests confirmation that this understanding is correct.

PSE suggests that BPA provide an example of a contingent service offer, including the conditions attached to it and associated financial requirements. BPA should specify at what stage it would require project securitization from the customers and if it would occur before commencement of project construction. Based on the materials presented, it appears the customer off-ramp that currently exists following completion of environmental studies may no longer be available. It would be helpful to understand whether this was intentional, and if so, the rationale for removing this off-ramp.

PSE appreciates the opportunity to comment and looks forward to more discussions on this topic.

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