



Energizing Life in Our Communities

January 16, 2025

Submitted via techforum@bpa.gov

RE: TC-27 Workshops

Snohomish PUD (Snohomish) appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) TC-27 workshops held in December 2025 and January 2026. Snohomish is appreciative of the thoughtful work of BPA staff in preparing materials and is supportive of BPA exploring ways to meet its customers' transmission needs in a timely, reliable, and affordable way in a period of great change. Although we are still processing the information presented by BPA staff, we generally support the comments submitted by PPC and the NITS Customer Group and provide the following additional comments.

Queue Prioritization

Snohomish offers that any queue management alternative ultimately selected by BPA and its customers should prioritize load-serving entities (LSEs) serving their respective loads through either NITS or PTP. Because regional reliability requires load-serving entities to have sufficient transmission to serve their load and the Load-Following BPA Power product in particular is only compatible with the NITS product providing prioritization to LSEs ensures that economic requests do not detrimentally affect system stability. With unprecedented regional load growth on the horizon, it's imperative that LSEs have a defined pathway to meet community needs and ensure industrial-scale transmission requests are not hindering the ability to provide reliable power to the region's population. To that end, we propose that BPA and customers abide by the following principles:

- To the extent that BPA studies the queue through the use of batching, BPA should prioritize LSEs with either NITS or long-term firm PTP transmission service.
- BPA should apply data exhibit validation strictly to eliminate speculative TSRs.
- Avoid methods that dilute LSE prioritization, including status-quo queue retention.
- Rights of existing LSE long-term firm PTP customers should be preserved

Minimum Capitalization Rules

Snohomish primarily supports exemption of any minimum capitalization requirement for LSEs with a specified service territory and ability to raise its rates. Such LSEs meet all of the objectives listed by BPA in its presentation including having the financial strength to be sound partners, reduce ratepayer risk, and reduce risk of a transmission project that won't have follow-through. BPA should ensure LSE is defined in the context of the policy to include all retail electric utilities, as the term is used in different contexts within the electric industry. For those non-exempt entities, Snohomish supports a scaled minimum capitalization based on the level of transmission service request in study. We believe that a scaled approach ensures financially viable requestors and projects.

Large Load Facility Policy (LLF) for NITS

Snohomish supports the LLF threshold of 13 MW for determining which facilities must participate in commercial planning. We believe that this threshold should allow flexibility for organic load growth to be served and ensure proper study of larger facilities. It is important that the methodology capturing the 13MW threshold is appropriate and consistent with the NITS group concerns. These concerns center around whether incremental facility load growth could be reclassified as triggering this threshold and what processes that would entail. Snohomish also supports the NITS groups comments that more time may be needed to address very recent conversations on this topic so that BPA can receive more detailed feedback.

Further, facility check procedures should be consistent and transparent, and any LLF policy should seek to prevent the misclassification of LSE system load growth.

Virtual Point Reform (MIDCRemote/NWHUB)

Snohomish understands that there are challenges in developing plans of service for virtual transactions. However, on balance, we believe that the status quo must be maintained. Snohomish believes bilateral trading will continue to be important for the region even in an organized market framework. We oppose removal of virtual points which we believe will cause regional market disruption.

Snohomish also has concerns about the long-term rights entities currently have on virtual points should BPA decide to remove those points. We believe the status-quo maintains the value proposition of those rights but whatever option BPA chooses must ensure that the long-term rights of customers are not infringed.

Settlement Potential

BPA staff has explained that if customers and BPA were to settle the TC-27 issues that BPA can get ahead of the timeline for fixing the queue. Given the volume (250 slides) and the complexity of issues, it is difficult for Snohomish to envision full settlement opportunities at this time. However, a partial settlement on certain issues may be

achievable. A better understanding of BPA staff leanings on specific issues will provide a better vantage point to determine potential settlement opportunities.

Conclusion

Snohomish appreciates BPA staff's efforts to address these issues and the work that has gone into the multiple workshops to date. If BPA has any questions regarding these comments, please do not hesitate to contact us.

Sincerely,

Jason Zyskowski
Chief Energy Resources Officer
Snohomish County PUD No. 1

Cc:
Troy Simpson
BPA Transmission Account Executive