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TACOMA PUBLIC UTILITIES

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Tacoma Power Comments – BPA TC-27 Workshops, December 17-19, January 6-7 and 15

Tacoma Power (“Tacoma”) appreciates this opportunity to comment on the options BPA presented at its TC-27 pre-proceeding workshops held in December and January (“Workshops”). Tacoma would like to commend BPA for hosting this series of workshops that provoked questions, conversations and provided further insight into BPA’s thinking as it moves forward with commercial transmission reform.

Tacoma has completed and attached BPA’s Alternatives worksheet to these comments. Tacoma will provide higher-level comments and insights and will then summarize its responses to the worksheet, although the most specific detail will be found in the worksheet.

When asked in the Workshops which set of options BPA most preferred, BPA responded that suite of options it presented in the July workshops were those that BPA felt were the best to “get off pause” and start processing the queue. Tacoma would like to reiterate that part of the reason we are in the TC-27 proceeding is that many parties found those options to be untenable, if not - inconsistent with the principles of open access and fairness. Tacoma urges BPA to truly think outside of those July options, consider fully stakeholder comments and develop solutions that work for the vast majority of stakeholders, not just for certain groups or with speed at the expense of equity.

Another fundamental consideration with BPA’s alternate proposals is that some of them propose changes to BPA’s Open Access Transmission Tariff (OATT) that further remove the OATT from *pro forma*. BPA introduces new products and validation criteria that would require substantive OATT changes. Tacoma is particularly concerned that as BPA structures itself to enter a day-ahead market, it creates inequities between Balancing Authorities if it introduces products and queue requirements that other regulated and non-regulated market participants cannot pursue. BPA creates inequities not only within its customers and stakeholders, but also with outside market participants by stepping further from *pro forma*. Tacoma does not support any OATT change recommendation from BPA that step away from *pro forma* open access requirements. Tacoma also does not support BPA changes that award NT service from the continually dwindling pool of available Point to Point service. Along those lines, Tacoma also opposes any proposal that would delay incorporating NAESB or other industry standards.

Also concerning BPA’s future market interactions, BPA should carefully consider what effect the removal of virtual transmission points, such as MidC Remote, will have on market participants, both within and outside of the BPA BA. If BPA decides to make substantial changes to its current setlist of POR/PODs available to transmission customers, communicating this to Market Operators will be imperative. Furthermore, BPA should ensure that it is more consistent in engaging with third parties, both during the study process and when making service awards that affect other transmission systems.

Related to awarding service, Tacoma supports the immediate action of BPA in processing de minimis redirect requests in its queue. These requests are easily resolvable. Plus, engaging in immediate activity on the queue is indicative of good-faith efforts by BPA to remedy its queue issues. BPA should be able to issue these redirects without needing to consider potential subgrid issues, as these are definitionally small and should not impair the subgrid. The subgrid should also not impede BPA's ability to make Conditional Firm Service awards, especially to projects earlier in the queue. While Tacoma understands that BPA may not be able to award as much Conditional Firm Service, especially at the outset, it is necessary for certain customers to receive Conditional Firm Service awards regardless of potential subgrid limitations in order to meet increased load from end-use customers. BPA has a regulatory responsibility to deliver power to all preference customers in order for those entities to deliver to their end-use customers regardless of potential subgrid issues.

Finally, Tacoma continues to be concerned that this TC-27 commercial planning process is being drafted separately from BPA's reliability planning. BPA's fundamental responsibility is in reliability planning and, if BPA had been properly incorporating NITS load growth, for example, into its reliability planning, BPA would not be in its current conundrum. As BPA looks toward Proactive Planning, which Tacoma encourages it to do at the earliest possible time, it must consider both Reliability and Commercial Planning under the Proactive umbrella. If BPA moves forward with a plan to address commercial issues, but does not resolve its fundamental planning over-conservatism, then BPA will just be in a revolving loop of planning shortfalls. If BPA applied the same customer-forward openness in its reliability planning, in line with what FERC introduced in Order 1920, as it has espoused with its TC-27 commercial planning agenda, BPA would not need a separate Proactive Planning process.

For BPA's convenience, Tacoma is providing a summary of its TC-27 Alternatives from the spreadsheet included with this comment submission:

Evaluation Criteria

Tacoma supports EC-SM-ALT-5, with the caveat that it must be possible to have executed a Phase Two Cluster Study Agreement. If it is not possible to have executed that Study Agreement, then Tacoma supports EC-SM-ALT-6 as the default.

Tacoma also supports EC-LM-ALT-3, with the caveat that this should be limited to after the completion of the System Impact Study.

Tacoma does not support any of the suggested RAS criteria.

Tacoma supports EC-PTP-ALT-4, Status Quo, for PTP requests to NT PODs.

Tacoma supports EC-B2B-ALT-3, allowing LTF battery to battery F/TSRs.

Tacoma supports EC-ADD-ALT-2, maintaining existing OATT language for Additional Information.

Tacoma supports EC-VHUB-ALT-6, which actively supports LTF use of NWHub.

Tacoma supports maintaining the Status Quo, EC-PV-ALT-11 for Party Validation and EC-MCAP-ALT-3 for Minimum Cap Requirements.

Interim Service

Tacoma supports Product Options IS-POPT-ALT-1, Seasonal Firm NITS and IS-POPT-ALT-4-Sub-A, PTP CFS.

Tacoma supports either IS-MV-ALT-2, Not mandatory until POS has been developed, or IS-MV-ALT-3, Status Quo, under Mandatory-Voluntary.

Tacoma supports either of the options IS-CT-ALT-1 or IS-CT-ALT-2 under Curtailment Type.

Queue Management

Tacoma supports QM-ECQ-ALT-1, Status Quo, for Applying Evaluation Criteria to the Queue.

Tacoma supports QM-CEC-ALT-2, Customers submit a new data form, under Collecting New Evaluation Criteria.

Under Structuring the Queue for Study, Tacoma supports QM-SQS-ALT-2-Sub-A, Queue Order. Tacoma supports QM-HNS-ALT-4, Second Transition Study, under Handling New Submissions.

Tacoma supports QM-FSP-ALT-1, Status Quo, under Firm Service Prioritization.

Proactive Planning

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.

Interim Service from January 15, 2026 meeting

Tacoma remains neutral at this point on IS-PO-ALT-4-SUB-C, IS-PO-ALT-5-SUB-C and IS-PO-ALT-8-SUB-C, NITS Customer PTP Bridge CFS with NITS Firm Option. Tacoma thinks this product, of all the additional products BPA has suggested in this proceeding, is the most equitable for both NITS and PTP customers. Tacoma supports IS-PO-ALT-8-SUB-A. Tacoma is neutral at this point on IS-PO-ALT-9.

Tacoma Power appreciates this opportunity to comment and provide input into BPA's TC-27 process. Tacoma looks forward to continued participation and hopes that BPA continues to step outside of its comfort zone in order to effectuate real change in BPA's planning processes.

Sincerely,

/s/ Leslie E. Almond

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Cc:

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