Dear BPA,

On behalf of WOR TX Holdings LLC ("WOR TX"), please accept this letter as WOR TX's formal objection to the proposed TC-27settlement and Transition Planning Process.

WOR TX Holdings is a member of the PRITCA coalition and adopts in full reference the opposition and comments filed today by PRITCA.

WOR TX holds a substantial position on the Bonneville Power Administration (BPA) transmission system:

Transmission Position	Approximate Quantity
Confirmed long-term firm service	1,700 MW
Pending transmission service requests (TSRs)	1,260 MW
Total	**2,960 MW**

Each of these positions was acquired or requested, and capital committed against it, under the tariff, business practices, and study processes in effect at the time. Those rules included the ability to redirect confirmed service, to defer service when needed, and to have pending requests studied in queue order. The settlement changes all three.

Harm to WOR TX's Confirmed Service

Redirects: The ability to redirect is part of the value of firm transmission. Under the settlement, long term redirects that require study remain effectively frozen. Only those submitted before the eligibility cutoff can be considered in the transition (Sections 2.a.i, 2.a.i.1, 2.b.xi). WOR TX's 1,700 MW of confirmed service is therefore locked in place, even though BPA's new conditional firm and flowgate methodology is well suited to evaluating exactly these kinds of requests. Customers who need firm delivery for resource adequacy and clean energy compliance are left without it and transactions that would use existing transmission more efficiently cannot proceed.

Deferrals: WOR TX cannot defer underlying service without first withdrawing its pending redirects and forfeiting their priority (Section 2.e.ii and related business practices). That rule was workable when BPA was studying redirects on a regular basis. With those studies halted each withdraw and refile cycle simply moves WOR TX further back. WOR TX accepted the risk that a redirect study might come back negative, it did not accept that redirects would go unstudied indefinitely.

Availability and curtailment: Conditional firm awards to other parties, combined with the limits on redirects can be expected to reduce available transfer capability and increase curtailment of WOR TX's firm, short-term, non-firm, and redirected service (Sections 2.a.ii, 2.d.iii, 2.d.iv,

2.e.i). BPA has acknowledged that it has not quantified these effects on the short-term ATC market.

Competition and market impacts: The settlement awards conditional firm service to competitors while freezing redirects and relegating existing requests. Those awards will reduce the ATC that WOR TX and other market participants rely on for short-term firm, non-firm, and redirected service, and increase curtailment exposure on those products relative to historical levels. By reallocating queue value, transmission capacity, and market access among similarly situated customers, the settlement creates economic winners and losers, alters competitive market dynamics, and confers undue preference on select customers and resource classes, contrary to open-access principles.

Harm to WOR TX's Pending Requests

Removal and relegation: WOR TX objects to Sections 2.b.ii, 2.b.iv, 2.b.v, 2.b.vi, 2.b.x, 2.c.ii, 2.c.vii, and 2.d.iv, which permit BPA to remove, reorder, or subordinate existing TSRs that do not satisfy the new criteria or that do not enter the conditional firm process on BPA's terms. For 1,260 MW of pending requests, to move gigawatts back in the queue has the same commercial effect as removal. The settlement offers no path for a customer to decline the transition process and keep its original timestamp and queue position.

Retroactive criteria: New data exhibit, validation, maturity, and continuing compliance requirements are applied to requests that were already submitted and accepted, with cure periods that cannot realistically be met (Sections 2.b, 2.b.i, 2.b.ii, 2.b.iii, 2.b.iv, 2.b.viii, 2.b.xii). A customer also cannot make a conforming change to a TSR, such as a revised POR/POD or start date, to match an updated data exhibit without losing its timestamp.

Unequal eligibility: The eligibility framework favors incumbent generators, late-stage interconnection requests, and designated locations, and limits the use of virtual hubs (Sections 2.a.i.2, 2.a.i.3, 2.b.v, 2.b.vi, 2.b.vii). Load maturity depends on BPA completing its own system impact studies, which the customer cannot control. Later and preferred requests may thus receive long-lived transmission rights while earlier, similarly situated requests like WOR TX's are pushed aside.

Ties to individual loads and generators: WOR TX does not believe that the right to transmission service should be contingent on a specific load or generator. Point to point service exists so customers can move power between points to serve a range of commercial needs, including market hubs, load-serving entities, storage, and multiple suppliers over time. Requiring each request to be tied to an individual resource or load hinders the flexibility and commercial viability of requests, discourages transactions that would serve the region, and results in transmission that is not effectively utilized.

No study commitment: BPA commits to a new planning framework by November 2029, but not to studying actual TSRs by any date (Sections 1.3, 2.a.iii, 3.f). Nothing prevents the future

framework from prioritizing system-level studies or omitting TSR-specific studies altogether, leaving WOR TX's pending requests unresolved for many years.

Cost and terms of the conditional firm offer: WOR TX would be asked to pay fees, post security, and risk forfeitable deposits for a product whose managed constraints, relieved flowgates, and mitigation priorities have not been identified (Sections 2.c.iv, 2.c.v, 2.c.vi, 2.c.vii, 2.d.ii, 2.d.v). The initial 24-month service-start window is narrow enough that later requests can effectively leapfrog earlier ones in subsequent windows.

Inconsistency with Open Access Requirements

The settlement is not in line with open access principles. BPA's tariff is built on the principle that eligible customers may request and receive transmission service between points on comparable, non-discriminatory terms, with requests studied and processed in queue order. The settlement instead conditions access on new eligibility screens, subordinates or removes earlier requests to the benefit of later or preferred ones and suspends the study of long-term requests and redirects for an indefinite period. Each of these departs from the open-access, first-come, first-served framework on which WOR TX and other customers relied.

Lack of Supporting Record

BPA has not identified the flowgates it intends to relieve, the paths or megawatts that would be enabled, or the customers expected to benefit. Absent that information, there is no record showing that the settlement's benefits outweigh its costs to transmission customers, generators, load-serving entities, and other market participants, or that BPA weighed less restrictive alternatives.

BPA's reliance on a future state is likewise insufficient. BPA points to a future planning framework and future policy development as the answer to the harms raised by stakeholders, but those claims are not supported by real data or analysis, and there is no certainty about what that future framework will contain, when it will be implemented, or how it will treat the rights and requests affected by the current action. Undefined future processes cannot justify the concrete and immediate harm the settlement imposes today.

WOR TX believes several targeted changes would substantially address these concerns, including:

1) Eligibility for redirects of confirmed service submitted through the Record of Decision; preservation of pending redirects during deferral;

2) A customer opt-out that preserves queue position;

3) A date certain TSR-specific study of the remaining queue.

4) Bounded TSR and data exhibit updates without loss of timestamp, and a broader initial service-start window.

Impact Conclusion

WOR TX objects to the proposed TC-27 settlement. WOR TX asks that BPA resume studying transmission service requests and long-term redirects under its current authority and open-access principles, rather than adopting changes that impair existing rights without adequate support. The settlement as proposed causes ongoing financial harm to WOR TX and other transmission customers.

WOR TX reserves the right to supplement these objections and to seek clarification of how the settlement terms would be implemented. This letter does not waive any of WOR TX's rights under BPA's tariff, business practices, existing transmission service agreements and requests, or applicable law.

WOR TX expressly reserves all rights, claims, and remedies available to it, at law or in equity, with respect to the TC-27 settlement and any BPA decision adopting or implementing it, including without limitation the right to participate in and challenge the TC-27 proceeding, to seek administrative and judicial review, and to pursue any other relief available under applicable law. The absence of an objection to any specific provision in this letter shall not be construed as acceptance of that provision.

Sincerely,

Authorized Representative

WOR TX Holdings LLC