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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Grid Access Transformation Initial Comments (fast feedback)

Interim Service and LTF Queue Management

Seattle City Light, (City Light) believes these areas are intertwined and need to be addressed holistically. We believe BPA's initial informal idea of granting initial service to mature, verified transmission service requests without transmission planning study was the correct step forward for the transition process and the future state.

City Light suggests that the various study steps outlined in the discussed-on slide 63 are unnecessary for an initial offering. This includes if BPA intends for TSR's not yet studied to be required to participate in Preliminary Engineering Agreements and Environmental Study Agreements related to the existing Evolving Grid 2.0 projects or future projects. These cost sharing pools can be allocated by existing path impacts by agreement without study. While not an exact accounting, for a transitional process granting initial less than firm service that leads to firm long-term service, very few serious requestors will object to this methodology in our opinion. We understand as a BPA Transmission customer that accepting this initial offering of service would be paid for under the existing rate structure. We suggest that the first step in the process be to limit the deferral of service to 12 months (or less) with no exceptions. This influx of additional funds should be applied to accelerating transmission expansion projects and limiting future rate increases.

City Light believes from an operational perspective that the availability and current use of non-firm by Point-to-Point (PTP) customers and 6NN by Network (NT) customers greatly mimics customer choices and grid flows that would occur with this new initial product. We understand that BPA Operations would be naturally opposed to this change due to the perceived risk. City Light suggests that the risks are minor, acceptable, and in keeping with good engineering judgement and within regulatory operating limits. City Light additionally suggests limitations to BPA curtailment tools are likely limited to specific areas of the BPA system and can be operationally addressed. BPA is already proposing to not allow initial offerings to request that affect NWACI as an example.

City Light suggests that if BPA Operations needs additional risk avoidance, the new initial offering could have a stipulation that it must be scheduled prior to 1400 hours the day prior to use. This would allow for the scheduled flows to be considered in next day plans and reviews.

General Comment regarding Exceptions and Special rules.

City Light, like all entities, advocates for the best outcome for our ratepayers. City Light suggests that when BPA agrees to language supporting exceptions and special rules accommodating one subset of customers to gain

consensus only has some limited value. City Light proposes BPA should not memorialize exceptions and special rules in either the NITS Load Forecasting or the Readiness Criteria. Much of the existing challenges with transmission expansion processes have roots in BPA accommodating specific customer concerns to the detriment of a better, least cost, process for all. City Light understands that this may affect existing City Light TSRs.

NITS Forecasts

City light supports BPA designating the New Large Load Threshold per POD. We suggest that the permanent designation of that POD should be moderated to the time it takes to grant Long-Term Firm Service for the above threshold load forecast.

City Light additionally suggests that the 13MW threshold is too high without consequences for over forecasting. If most NITS customers over forecast, this could have unintended rate impacts on all customers.

City Light Thanks BPA for considering this limited initial feedback. We will be submitting more complete, fully developed comments as well.

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cc: Melanie Jackson, Bonneville Power Administration