

August 15, 2025

BONNEVILLE POWER ADMINISTRATION  
PO BOX 14428  
PORTLAND OR 97293-4428

Submitted via BPA's Tech Forum ([techforum@bpa.gov](mailto:techforum@bpa.gov))

Comments Concerning Grid Access Transformation July 29-30 Workshop Topics

Seattle City Light (City Light) appreciates Bonneville Power Administration (BPA) engagement with customers regarding BPA's Grid Access Transformation. Please accept the following comments.

**General Comments:**

City Light applauds BPA for undertaking the Grid Access Transformation process. Your hard work and dedication are appreciated.

City Light suggests BPA schedule an additional deep dive collaborative workshop with customers regarding business practice changes supporting the Grid Access Transformation transition. This could be a customer-led workshop where BPA responds to customers' suggestions and questions. This should happen with enough time for BPA to incorporate these ideas into the redlines of the affected business practices.

City Light recommends BPA consider opening a transmission product conversion window due to the disruptive nature of the Grid Access Transformation. Customers should be allowed to change transmission products for a period from the initiation of the GAT business practice changes until BPA completes and publishes the results of the first future state transmission planning study.

**NITS New Network Load and Line & Load Interconnection Requirements**

City Light suggests that BPA considers that a bright line between trended and commercial load growth should be a percentage closer to 2.0% or less. The proposed single value of 13MW is far too large for most BPA NITS customers under the proposed scheme and additionally unfairly penalizes large NITS customers.

City Light recommends that a bright line architecture that allows many BPA NITS customers to double their load in 5 years is neither sustainable nor equitable to customers under cost causation.

City Light additionally suggests BPA clearly state that accepted NITS forecasts will be the values used in BPA agency forecasts and BPA WECC base case updates. If BPA has doubts about planning for NITS LaRC forecasts, they need to institute policy mechanisms to ensure the accuracy of accepted forecasts. Additionally, only accepted forecasts should be used for encumbering transmission.

### **FTSR & TSR Data Validation Readiness Criteria**

City Light supports BPA applying updated TSR Data Validation Readiness Criteria to TSRs in the Queue that have not accepted a service agreement or executed a Preliminary Study Agreement.

City Light supports BPA including a path for PTP requests other than designated resources to load to achieve Data Validation Readiness Criteria. A security deposit in lieu of meeting criteria is an acceptable alternative.

City Light supports BPA accepting a security deposit in lieu of meeting commercial readiness for TSRs.

### **Long-term Firm Queue Management**

City Light encourages BPA to provide an interim service option to the BPA queue after filtering for Data Validation Readiness Criteria and NWACI impacts. These interim service agreements could include language allowing BPA to require future participation in study and projects. City Light believes that the alternative is an eventual queue still too large for BPA to effectively study.

City Light suggests BPA convenes a meeting of NWACI owners to candidly discuss the risks and benefits of BPA offering interim service that affects NWACI facilities.

City Light recommends BPA institute a policy change of not allowing deferral of service or extension of commencement of service longer than 12 months. City Light additionally suggests that the current deposit requirements for deferral or extension of commencement should be increased to the five years of service amount.

### **Interim Service**

City Light recommends that BPA consider that Interim Service offerings need to be investment grade commitments. Financial institutions and investors need firm commitments that interim service will be available when requested and that the interim service will have a transparent path to permanent long-term firm service with rollover rights.

City Light requests that BPA consider that Interim service to and from virtual scheduling points, such as NW HUB, need to be a bridge type condition firm service to provide a path to long-term firm service. Providing reassessment conditional firm service to PTP customers while providing 6NN enhanced NITS service to NITS customers would be less than equitable treatment between customer groups.

City Light recommends that the rules for Interim Conditional Firm PTP service and Enhanced 6nn NT service for short-term firming up be equitable between the product types. It may be better for interim

service to never be firmed up in the short term regardless of product type. This would be equitable treatment of customers. It is in both customers' and BPA's interest to choose a policy solution that would not require a lengthy and expensive software change to e-tag management or curtailment software.

City Light recommends that BPA's securitization requirements for interim service apply equally to both PTP and NT customers.

City Light requests BPA to consider that customers that execute a five-year or longer interim service agreement with a start date within 30 days should only be required to supply three years of service security.

Seattle City Light thanks BPA for its effort and dedication to meeting customer transmission needs and for considering these comments.

Michael Watkins  
Strategic Advisor  
Seattle City Light

cc: Melanie Jackson, Bonneville Power Administration