BPA Staff Responses to Comments Received from the April 21, 2025 Transmission Planning Reform Workshop

The comments summarized in this document are available in their entirety on BPA's Grid Access Transformation Project (formerly referred to as Transmission Planning Reform) webpage.

Table of Contents

I. Scope Related Comments

Commenter	Summary of Comment	BPA Staff Response
Public Generating Pool	PGP supports BPA's problem statement and generally agrees with the premise that a fundamental shift in how BPA expands and grants rights on the transmission system is necessary to meet customer, constituent, and market needs. However, PGP recommends that BPA consider other potential approaches to defining the vision. In the materials, the defined vision is going from 'request to service in less 5-6 years.' This vision seems to assume a problem statement rooted in the challenge of slow and clogged queues and the current inability of BPA to respond to customer requests in a timely way. The articulated problem statement is more expansive than this and PGP recommends considerations of a defined vision that is similarly expansive and aligns better with the fundamental changes BPA seemed open to in the meeting dialogue. The fundamental shift for BPA is from a time of predictable and slow (or no) growth to a period that includes significant and dynamic growth, an evolving resource mix, increased linkages between resource adequacy and transmission availability, and the need for strategic and economic investments in infrastructure. It is possible that the problem statements articulated require more than the vision of a reformed customer queueing process but requires a holistic and reformed approach to infrastructure investments and system expansion in general. This may mean a more wholesale realignment of functions and workstreams to pivot to the proactive vs reactive approach referenced by BPA leadership in the meeting. This transformation will implicate processes other than the service request processes referenced in the meeting materials.	The overall vision of 'request to service in 5-6 years' will remain the same. However, the scope of the process is expansive, as shared in the meeting materials for the July 9-10 workshop. It will include a transition phase to get Bonneville and the region to a Future State.
Public Generating Pool	From an overall scope perspective for this reform process, PGP would also like to understand when BPA will be discussing potential improvements relating to project execution and the design of the on-demand service. In alignment with an expanded vision, this process should not focus only on the "Transition to Future State" but will also need to address the details of on-demand service design and new mechanisms to cost-effectively and proactively upgrade the system. BPA may also need to consider new and developing processes that are also designed to support economic transmission in the region, and related voluntary funding and partnership approaches. These components of the overall reform process may have unique problem statements, design questions and solutions sets, but will still need to link back to the planning and request management workstreams. Given the broad scope of this stakeholder process and the aggressive timeline, it may make sense for BPA to focus first on the planning reform and related enhancements to request management, and to later focus on these other components of the vision. Regardless of BPA's preference on how to best separate and sequence these topics, providing a more detailed roadmap for when these may be discussed could enable customers to focus input on the right topics at the right time.	Thank you for the comment. Like the above response , the scope of the process is expansive. BPA will be discussing how it will make improvements to project execution and how interim service (formerly referred to as on-demand service) will be provided. It is likely that as we shift to a new model different approaches for funding and partnership will be needed. These will be discussed with interested parties.

Commenter	Summary of Comment	BPA Staff Response
Klickitat County PUD No. 1	Public Utility District No. 1 of Klickitat County is currently a Network Integration Transmission Service ("NT") customer of the Bonneville Power Administration...supports the transparent and open stakeholder process BPA is conducting to develop reforms to its transmission planning process necessary to address transmission service needs of its customers.	We appreciate the comment and Klickitat's participation in the on-going process to develop reforms to BPA's transmission planning and related processes.
Columbia River PUD	CRPUD greatly appreciates the steps that BPA is taking to reform transmission planning. We are grateful that BPA aims to create a process that will take a request and grant service in less than 5 to 6 years.	Thank you for your comment.
Big Bend Electric Cooperative	Big Bend Electric Cooperative is a long time Network Integration Transmission Service ("NT") customer of the Bonneville Power Administration....supports the process BPA is conducting to develop reforms to its transmission planning process which are very necessary to address the transmission service needs of its customers.	Thank you for your comment.
Puget Sound Energy	PSE appreciates BPA's efforts to reform the transmission planning and award processes to deliver service on a much quicker timeline. We agree that the current TSEP process will be unable to meet customer demands for additional transmission in a timely manner so that the region's growing load and clean energy goals can be met.	Thank you for your comment.
Puget Sound Energy	BPA discussed potential options on how to reform the current process. We support a 5-6 year timeline from request to service and believe that BPA can achieve this goal.	Thank you for your comment.
Seattle City Light	City Light supports BPA's vision of providing firm transmission service within five to six years of the original request. As an entity that requires additional Cross Cascades North path capacity, City Light requests BPA develop a project plan to achieve this goal.	We appreciate the interest in Cross Cascades North. Details for Cross Cascades North are included in the Evolving Grid Project 1.0 Summaries. More information about evolving grid projects will be shared in future meetings.
NT Customer Group	We generally support the objectives set forth by BPA leadership for BPA staff and the region to consider "disruptive" changes to BPA's processes to better meet the needs of its transmission customers, including the vision of providing service within 5-6 years of a request being submitted.	Thank you for your comment.
PPC	PPC acknowledges that there is some tension between the need to address this issue quickly and the desire to take a holistic approach to developing a solution. This underscores the need to work quickly and efficiently to explore alternatives together in order to achieve both of these objectives. PPC has appreciated the conversations to date and is supportive, at a conceptual level, of the proposed approaches presented by BPA: proactive planning, on demand service, and increased project execution. We are encouraged by the vision behind these ideas. The details surrounding BPA's approach to each of these concepts will be critical in determining whether this transmission planning reform is successful and consistent with the needs of utilities in the region.	Thank you for your comment. We appreciate PPC's participation.

Commenter	Summary of Comment	BPA Staff Response
PNGC	Pacific Northwest Generating Cooperative (PNGC Power) provides these comments are intended to help inform and further shape BPA's Transmission Reform Process. PNGC Power believes it is imperative that BPA move expediently to develop solutions that will ensure reliable, cost-effective load service over the long term. BPA's transmission system faces many challenges ahead and we expect that changes will be disruptive. Difficult decisions will need to be made when exploring all options, but the focus must remain on its load service obligations to its preference customers. PNGC Power is a growing organization that will likely become BPA's largest preference power customer at the start of the next power sales contract (i.e., Provider of Choice). PNGC Power members depend on BPA's Network Integration Transmission Service (NITS) to serve geographically isolated, economically disadvantaged communities, and many farmers, and irrigators. The purpose of our comments is twofold: (i) to reinforce our support for the broader comments submitted by the NT Customer Group on May 2, 2025, and (ii) to provide BPA with additional substantive feedback on issues that are important to our membership.	Thank you for your comment and continued participation in this workshop series.

II. Process Related Comments

Commenter	Summary of Comment	BPA Staff Response
NRU	As an initial matter, NRU welcomes BPA's transparent and open stakeholder process to identify and evaluate proposals associated with its Transmission Planning Reform effort. We recognize the criticality of addressing the impediments to BPA's ability to meet the transmission service needs of its customers, and would like to take this opportunity to emphasize the need to craft solutions in a collaborative and inclusive manner. To this end, NRU is committed to engaging with BPA in these regional conversations to the fullest extent. However, while we greatly appreciate the information provided in this most recent workshop, we note that BPA provided nearly all meaningful aspects of its conceptual proposals verbally, with virtually no specific supporting information provided in writing. BPA also elected to not record the workshop for posterity or subsequent stakeholder review. Going forward, we respectfully request that BPA provide in writing or otherwise record or make available the specific information related to its proposals necessary for its customers and stakeholders to provide meaningful feedback; otherwise, BPA risks receiving comments that are reliant on incomplete or faulty information, which could frustrate BPA's identification of viable solutions and the implementation of timely reforms.	Thank you for your comment. More details on the proposals are being provided at the July 9-10 workshop. Additionally, the workshop will be recorded.
PPC	BPA Must Engage Early and Often with Customers During the Process Following BPA's initial transmission reform workshop, the agency hosted a "customer led" workshop in which customers shared perspectives and potential solutions. Customers presented creative ideas, sought to understand others' views, and leaned in to find a path forward that would best allow BPA to serve regional needs. The discussion at this meeting was robust, despite the limited time given to customers to prepare. It was unfortunate that BPA staff did not engage substantively, even in the form of asking questions, during this discussion. Achieving the type of transformational change that the agency envisions will require regular, open conversations with customers. Customers need to have the opportunity to work side by side with the agency to develop, improve, and implement potential solutions. The next planned engagement with customers is in July. That is too long of a period to elapse between now and that planned forum, particularly given the proposed speed of this initiative. BPA should add a meeting in late May or early June to share early impressions of the ideas presented at the customer-led workshop. Even an initial conversation with indications of whether any of the customer-propelled ideas seem particularly promising or are being considered "off the table" would be helpful in these early stages. Another scheduled workshop would allow BPA and customers to further discuss possible alternatives together before the agency returns with more completely formed alternatives in July.	Thank you for your comment. The updated customer engagement schedule is provided in the July 9-10 workshop materials.

III. Education Related Comments

Commenter	Summary of Comment	BPA Staff Response
Public Generating Pool	PGP appreciates BPA's recognition of the need to update its focus and processes through this Transmission Planning Reform effort. To align with BPA's stated willingness to explore wide-reaching process reform, PGP recommends expansion of the vision to incorporate proactive planning and new approaches to infrastructure, stakeholder education and improvements to process transparency to enable efficiency gains, and project guidance that incorporates a plan to address the critical topics of the on-demand service design and enhancements to how transmission in the BPA system is built and paid for.	Thank you for this feedback. There will be opportunities to engage on these topics and their interrelation during future workshops.
Public Generating Pool	In general, PGP supports BPAs goal of making improvements to ensure the Federal Columbia River Transmission System can cost effectively and reliably meet current and future needs. PGP sees this process as an opportunity for BPA to learn from others who are adapting to this changing landscape, to find a process that is both effective and sustainable to not only respond to customer requests, but to plan the system in a way that better anticipates customer needs. The process should include customer needs that are reliability or policy-driven while providing information and mechanisms to facilitate economic investments in the system. To better understand the objectives of any reforms, it would be helpful to have a clear articulation of how BPA Transmission staff and transmission customers define their "needs" on the BPA Transmission system. Such an assessment could help all stakeholders to understand: • Where do the needs of various BPA transmission customer types align and complement each other? Do some types of customer needs generally drive the need for larger infrastructure investments? • Can some needs be met with new or reinforced infrastructure while others can be met with non-wires or process and capacity allocation solutions? • How are these needs changing in ways that require new processes and procedures to effectively meet them? • What data sources exist that can provide insight or justification for these needs without creation of duplicative processes? • How do we determine core needs vs risks worth analyzing to determine least-regrets strategies? • What mechanisms are already in place or missing for evaluating these needs and identifying solutions with appropriate levels of confidence? • Where can synergies be gained? • Where will tradeoffs need to be made and how will needs be prioritized when necessary? Can BPA develop a set of objective criteria to prioritize projects and solutions?	These questions will be addressed in future Proactive Planning workshops.

Commenter	Summary of Comment	BPA Staff Response
	• What uncertainties could drive significant changes in this needs assessment and how can they be incorporated into scenario planning or inform economic investment opportunities?	
Public Generating Pool	As a starting place, the discussion during the April 21st workshop demonstrated that each customer group appears to have somewhat distinct versions of what the system "needs" are, many with more in-depth problem statements relating to their group and customer-type specific process. This highlights the siloed nature of BPA's current approach, and the potential benefits of improving the shared understanding among BPA's various customer groups for what the needs of other groups are, and where they may be aligned or complementary to inform proactive planning and cost-effective investment decisions. BPA could support this process by providing clearer documentation up front of how BPA's internal transmission-related processes currently inform and relate to each other, and where they do not. While BPA identified some discreet internal processes for improvement, notably the NITs forecast, the existing Transmission Queue, and Readiness Criteria, PGP sees proactive planning to address evolving risks and resource mix changes as broader than these three concepts/workstreams, which will require a holistic view of the system and future state we are planning for. This holistic view should include clearer cross-walks between the interconnection, line and load, and transmission rights request needs and the System Assessment and Long-Term Planning processes and any scenarios analyzed under these processes.	Thank you for this feedback. There will be opportunities to engage on these topics and their interrelation during future workshops.
Public Generating Pool	BPA's problem statements and the evolving regional landscape also implicate some external processes that could potentially be used to help align BPA's process with best practices and add transparency. Beyond the data sharing between these processes, customer groups and/or BPA could clarify key timelines and milestones in each separate workstream that may present opportunities for alignment, automation, minimization of duplicative processes, or efficiency gains. Examples include but are not limited to: utility procurement plans, project development timelines and milestones, queue analysis vs an evaluation of policy and resource adequacy driven procurements likely to be constructed in BPA's balancing area, linkages to WestTEC, WECC scenario analysis or WECC reporting data, and alignment of data requests/commitments with new resource and new project milestones. At minimum, it would be helpful to understand where these processes currently inform each other, and to hear BPA's assessment of where external data sources and processes may be used.	This will be addressed in future workshops.

Commenter	Summary of Comment	BPA Staff Response
Public Generating Pool	Further development of the goal and definition of a shared vision of what success looks like in today's context will help to guide the scope of this project, and help customers and BPA to appropriately assess tradeoffs when needed while supporting the agency in development of a suite of reforms and identification of solutions that can address the current challenges. Similar to other BPA processes, a benchmarking exercise to compare to industry best practices may also help to establish a shared vision of success across BPA customer types and business models. Such an exercise could also document unique features of the BPA system as compared to other regional TSPs and/or RTOs/ISOs that will need BPA-specific solution sets that are not found elsewhere.	BPA staff is conducting an industry scan of transmission planning practices at regional TSPs and RTOs/ISOs and intends to share findings from this effort at the July 9-10 workshop.
Public Power Council	PPC is encouraged by BPA's willingness to explore new approaches in its planning process to help it better serve regional demand, which in many areas is growing at an unprecedented pace. The challenges associated with planning for BPA's system will most benefit from a holistic solution across multiple planning processes and the agency's other key initiatives. Customers have repeatedly requested that BPA help put its "commercial" planning processes in context, clarifying the interactions between BPA's various planning processes (TSEP, Attachment K planning, Generation Interconnection studies, Line and Load Interconnection studies, etc.).	Thank you for your comment. BPA agrees that a more simplified visualization of its commercial planning processes would benefit discussions and will be working on status quo and future state representations to be shared during future workshops.

IV. Principles Related Comments

Commenter	Summary of Comment	BPA Staff Response
PPC	PPC Principles for BPA Transmission Planning Reform 1) BPA's approach to transmission planning and execution must be consistent with the agency's statutory obligations to preference customers.[1] 2) BPA should prioritize policies and investments that facilitate regional load service. 3) BPA's approach should ensure compatibility with other key agency initiatives (e.g. Provider of Choice contracts, day ahead market participation). 4) BPA's objective to provide reliable, timely service should apply equally to all preference customers, regardless of their location on the system. 5) BPA must provide an indication on how it will plan for various Provider of Choice selections prior to customers signing the POC contracts. This includes addressing the planning process (both for NT and PTP service) for deliveries of: a. Tier 1 service b. Tier 2 service c. Non-federal resources to serve above contract high water mark load d. Non-federal resources to serve new large single loads e. Short-term market purchases f. "Trended" load growth g. "Non-Trended" load growth 6) The decision-making process for future investments must be transparent and informed by customers. a. BPA should plan and construct projects based on its customer's risk tolerance. b. BPA should formalize when cost allocation decisions will be made for projects and include in that decision process the opportunity for customer input. c. This transparency should include a clear and holistic description of how BPA's multiple planning processes (Attachment K, TSEP, LGIA, etc.) feed into the agency's overall capital plan. 7) BPA should expand its planning horizon to include a 20-year evaluation. [1] As summarized in the Provider of Choice final Record of Decision: Whenever requested by a public body or cooperative entitled to preference and priority under the Bonneville Project Act, Bonneville is obligated to offer to sell electric power to that public body or cooperative through	Thank you for your comment. We agree with the need to develop principles and will be sharing the principles developed for each workstream in the TPR process during the July 9-10 workshop.

Commenter	Summary of Comment	BPA Staff Response
	contracts that cannot exceed 20-year terms. Congress also authorized Bonneville to construct, own, and operate transmission or to purchase transmission to deliver the electric power in satisfaction of this contractual obligation. In exercising its authority to market and transmit electric power, Bonneville's statutes provide that there be sufficient capacity for the transmission of electric power—generated or acquired—to satisfy Bonneville's contractual obligations. Prior to 1996, Bonneville fulfilled this obligation through a bundled power and transmission contract. With the advent of transmission deregulation in 1996, Bonneville has fulfilled this obligation by and through its adoption of the OATT. Under its OATT contracts, Bonneville has a legal obligation to provide transmission service, consistent with the terms of the Tariff and customer's respective transmission contracts.	
PNGC	PNGC Power's Transmission Reform Principles: • BPA must maintain focus on providing reliable, timely service to all preference customers, including those communities who rely on transfer service. • BPA's obligation is to proactively plan, maintain and build a transmission system that will ensure reliable, long-term firm service for customer load service. We fully support overhauling BPA's planning and decision-making processes because they are critically important to the challenges we are facing today and in the future. • BPA should develop a "short-term" solution to expand offering 6NN products and services to support NITS load growth. This should include modifications to BPA's transmission reservation business practices to increase scheduling window rights and duration of service. • BPA must provide equal access to network transmission service for non-federal resource integration. This service is critical for communities who rely on non-federal resources to cost-effectively and reliably fulfill load service obligations that are beyond the firm capability that BPA can provide at the Tier 1 rate. • As a transmission provider, BPA has an obligation to provide transmission service on a firm basis for ALL load growth reasonably forecasted by its network transmission customers. PNGC Power is extremely cautious about bifurcation concepts (i.e., "trended" and "non-trended") that prioritize firm service based on BPA's categorization of our retail member loads. We have experienced significant discriminatory policies and practices implemented through BPA's New Large Single Load Policy. We are very concerned about the prospect of introducing similar concepts into transmission planning and operations, as they appear to undermine the intent of open access transmission principles intended to ensure equal and nondiscriminatory access to network transmission service.	Thank you for your comment. We agree with the need to develop principles and will be sharing the principles developed for each workstream in the TPR process during the July 9-10 workshop.

V. Statutes and Obligations Related Comments

Commenter	Summary of Comment	BPA Staff Response
Seattle City Light	City Light suggests that it is in all customers' interest that BPA follow *Pro Forma* OATT policy while meeting its statutory obligations.	Thank you for the comment. At this time BPA remains committed to alignment with FERC's pro forma OATT where possible. When it comes to potential changes to BPA's tariff, BPA intends to continue to use the principles adopted in advance of the TC-20 tariff proceeding. BPA will endeavor to adopt pro forma language unless changes are needed to: 1. Implement BPA's statutory and legal obligations, authorities or responsibilities; 2. Maintain the reliable and efficient operation of the federal system; 3. Prevent significant harm or provide significant benefit to BPA's mission or the region, including BPA's customers and stakeholders; or 4. Align with industry best practice when the FERC pro forma tariff is lagging behind industry best practice, including instances of BPA setting the industry best practice.
NIPPC/RNW	Of significant concern to NIPPC and RNW is that any reforms BPA undertakes in transmission planning not inadvertently discriminate in favor of federal resources. Many of the members of NIPPC and RNW are – or would like the opportunity to be – in the business of providing energy from non-federal resources to meet the needs of BPA's preference customers where such business is contractually permitted (regardless of whether those needs arise from Above High Water Mark load growth or arise from New Large Single Loads). This desire to compete in the wholesale market with other generators, including BPA's Power Business Line, to meet the applicable needs of BPA's preference customers is entirely independent of whether that customer chooses to take Point-to-Point or Network transmission service from BPA. One of the largest concerns and priorities of NIPPC and RNW members in this process is that any reforms not create a structural advantage for BPA's Power Business over competition from non-federal resources in meeting the needs of BPA's preference customers. Accordingly, as customers prepare their ten-year load and resource forecasts, the process for completing those forecasts should not include a default assumption that preference customer load growth will be met with federal resources. And preference customers who do select to serve their load growth with federal resources should not have priority access to transmission upgrades over competing needs for transmission service.	Thank you for the comment. Avoidance of any sort of undue discrimination or preferential treatment is certainly among the many factors BPA is taking into consideration in this process. From a statutory perspective, BPA holds out sufficient transmission capacity to "transmit electric power generated or acquired by the United States." 16 U.S.C. 838d. This language requires BPA to hold out sufficient capacity for federal power. This can result in planning assumptions if, for example, a NITS customer forecasts load growth without identifying generation to serve the load. NITS customers are welcome to forecast federal and non-federal resources. The more specificity NITS customers provide, the better BPA can plan for them.

Commenter	Summary of Comment	BPA Staff Response
Tacoma Power	See Tacoma Power comments for complete summary description of PTP and NITS regulatory history. In its Open Access Transmission Tariff (OATT), BPA defines a Native Load Customers as, "The wholesale and retail power customers of the Transmission Provider on whose behalf the Transmission Provider, by statute, franchise, regulatory requirement, or contract, has undertaken an obligation to construct and operate the Transmission Provider's system to meet the reliable electric needs of such customers." Given its historic and current behavior, Tacoma Power, and other PTP preference customers, meet the definition of Native Load Customers and should not be treated differently than other BPA preference customers based on a choice of transmission service. Under NERC's TPL planning standards TPL-001-5.1, BPA is required to plan for, "Known commitments for Firm Transmission Service and Interchange." Tacoma acknowledges that BPA has used this requirement to mean NITS transmission service, but firm PTP service to preference customers also meets this planning definition. As a customer that meets the definition of a Native Load Customer, as well as a BPA preference customer, Tacoma requests that its status as a Point to Point customer not dictate the treatment that BPA applies to its transmission service.	An important element of open access transmission service is customer choice. Customers must evaluate the risks and benefits in choosing NITS or PTP service to serve their load. PTP customers do not submit load forecasts because the product does not include an obligation on the transmission provider to plan for a customer's forecasted load growth. If customers choose the PTP product, they are electing to take the responsibility to determine when to submit transmission service requests and on what paths in order to accommodate their load growth or power purchases. With this election come a number of flexibilities including the ability to use the transmission for market purchases and sales or to redirect or resell the transmission. NITS customers do not have the same flexibilities and are required to submit forecasts to enable BPA to plan the system to accommodate their reasonably forecasted load growth. The reliance on the pro forma offerings of NITS and PTP have been the basis for BPA's transmission service since open access was introduced, rather than a determination of Native Load status. BPA does not envision a subordination of one service type over another, but an adjustment of planning processes to satisfy its obligations under the open access framework. With that said, as part of this reform effort, BPA is endeavoring to take a more holistic, proactive approach to planning, which will allow it to begin infrastructure expansion ahead of PTP customers' transmission service requests.

VI. Current Queue Related Comments

Commenter	Summary of Comment	BPA Staff Response
NIPPC/RNW	Another question that must be addressed is how BPA will allocate contract rights on transmission facilities that are developed based on the top-down study process described above. Under TSEP, BPA has aggregated customer transmission service requests; when the facilities are completed BPA simply allows customers to begin scheduling service based on the service agreements they signed. Under the new proposed paradigm – especially as the region begins to adapt to it – BPA may find that demand for service still exceeds the available supply. The problem of how to allocate a scarce resource when demand exceeds supply is not unique to transmission rights. Under the OATT, queue order has been the primary mechanism to determine which customer has access to a finite supply of transmission. But queue order is not the only mechanism FERC has approved to allocate rights on the transmission system. FERC has also approved a variety of Network Open Season models some of which include an auction mechanism for a portion of the transmission capacity. In Order 888, FERC approved queue order as a simple default mechanism to ensure that the processing of transmission service requests was not subject to discriminatory treatment. While processing requests in queue order has its place, BPA has already largely replaced strict processing of requests in queue order with a cluster study alternative (initially BPA's Network Open Season and currently with BPA's TSEP process) when it comes to using transmission service requests to identify transmission upgrades. NIPPC and RNW are open to considering alternative mechanisms to queue order so long as the alternative results in non-discriminatory open access.	BPA appreciate recognition of the challenges posed by the demand for transmission exceeding its supply, that there are potential alternatives to queue order, and the importance of non-discriminatory open access. BPA also notes its obligations to serve network load. BPA's vision for transmission expansion opens the door for multiple approaches, which can be used depending on circumstances. For instance: • Definition and application of New Large Network Load • Readiness criteria – maintains queue priority • Projects identified through proactive planning could use auction type mechanisms or service agreements with "PTSA" like principles.
NRU	On BPA's existing transmission queue during the transition phase, NRU understands that the current queue is comprised of both requests that have been studied and requests that have not. For those requests that have been studied, NRU assumes that those customers will continue pursuing the plan of service that was identified through prior study processes consistent with BPA's tariff. For the remaining requests, we generally support BPA's proposal to apply first-ready, first-served principles, including readiness criteria, to the transmission queue as briefly described at the April 21, 2025 workshop. Given BPA already applies readiness criteria and first-ready, first-served principles to its interconnection queue, it is reasonable to consider applying similar principles to its transmission queue. This may help align service priority more consistently across both interconnection and transmission service queues and facilitate more timely service to ready customers. Moreover, BPA could consider offering all unstudied transmission requests mandatory conditional firm service as a means to ensure it is planning only for those customers that are ready to take service—which, while unusual, would not be altogether dissimilar from that which BPA offered in response to its decision to not construct the I-5 Project in the 2017-2018 timeframe, although we note that this approach may be incompatible with BPA's current tariff.	a) Previously studied requests will continue forward, however, requirements for those requests to stay in the queue may change. b) BPA appreciates support for the idea of applying first ready, first served types of principles to the unstudied transmission service queue. c) BPA is evaluating what interim service (previously referred to as "On Demand" service) contracts would look like and plans to discuss this with the region.

Commenter	Summary of Comment	BPA Staff Response
NRU	Regarding BPA's current transmission queue and progression to proactive transmission studies, BPA indicates that the study will center around long-term scenarios and the load forecasts of its transmission customers instead of being primarily driven by its queue, as described in the workshop. As this may result in lesser demand than is reflected by BPA's current unstudied transmission queue, BPA could consider a number of options to align supply closer to the demand. One method, as previously noted, could be reliance on customer and state regulatory agencies to inform not only the load levels to which BPA should plan, but also resource locations and quantities to interconnect. This may assist with narrowing the study need and reducing the number of requests that require inclusion in the study. Again, as noted above, this may also shield BPA from accusations of undue influence over resource development opportunities. BPA could, alternatively, decide unilaterally what requests are suitable for aggregation in the study based on a combination of factors, as appears to be already permitted in section 19.10 of BPA's tariff. Once BPA has identified the most cost-effective and efficient solutions to meet the forecasted loads, BPA could also consider offering precedent transmission service agreements (maintained as Attachment O to BPA's current tariff) in queue order until such time the transmission facilities were subscribed. Finally, as mentioned in the preceding paragraph, BPA could consider applying strict readiness requirements as a means to further ensure that only customers that are ready to take service move forward.	We appreciate the ideas shared and will be considering these.

VII. Transition Related Comments

Commenter	Summary of Comment	BPA Staff Response
NIPPC/RNW	NIPPC and RNW encourage BPA to develop independent timelines for the transition and future state processes. BPA has paused processing of most requests for transmission service; BPA's customers need BPA to resume processing requests as soon as possible.	We appreciate the suggestion on creating timelines. The July 9-10 workshop materials contain BPA's updated timelines.
NIPPC/RNW	Accordingly, we encourage BPA to prioritize developing and implementing a transition process. Ideally, BPA and stakeholders will continue to work on the future state in parallel. But we should not delay acting on a transition process as we refine the future process.	We agree the future state can be developed in parallel with the transitioning of the current queue. BPA plans to discuss the transition process with customers at the July 9-10 workshop.

VIII. NITS Forecasts Related Comments

Commenter	Summary of Comment	BPA Staff Response
Klickitat County PUD No. 2	Supports the comments submitted by both NRU and the NT Customer Group. Specifically, supports BPA's commitment to providing "on-demand" transmission service, including ensuring firm transmission service on the existing system for load growth that is deemed "trended". While we understand more work has to be done to establish the definition and policies for "non-trended" load growth in light of BPA's obligation to plan to serve all NT forecasted load and resources, we appreciate BPA's explicit acknowledgment of the planning obligation it has under its tariff for NT customers, which include many of BPA's preference power customers. In addition, we support BPA's proposed long-term, scenario-based transmission planning process. Although we await additional detail on this approach, we believe that planning the transmission system based on the forecasted load of BPA's transmission customers is an improvement over the status quo and will more likely identify cost effective transmission upgrades necessary to ensure reliable load service over the long-term horizon.	Thank you for your comment. We will address your request for more information on long-term transmission planning processes during the July 9-10 workshop.
Columbia River PUD	BPA should rely on the LaRC from NITS customers, but reduce the 70% likelihood of a load materializing and focus more on efforts like PARS to future-proof construction and meet the 5 to 6-year goal. BPA should avoid relying primarily on trended load growth, as past trends do not always predict the future. In CRPUD's opinion, focusing on a trended pattern causes current growth areas to continue and limits areas that already lack sufficient capacity to grow because capacity does not exist, and the build time is too long, with industry not willing to wait.	Thank you for your comment. BPA intends to use the LaRC for the commercial process evaluation which is not subject to the 70% load forecast likelihood criteria. We are evaluating the 70% load forecast likelihood criteria in other transmission planning processes and we will address this in subsequent TPR workshops.
Big Bend Electric Cooperative	Supports the comments submitted by NRU and the NT Customer Group. Specifically, supports BPA's commitment to providing "on-demand" transmission service, including ensuring firm transmission service on the existing system for load growth that is deemed "trended". I would like to underscore a point that	Thank you for your comment.

Commenter	Summary of Comment	BPA Staff Response
	"trended" should include all organic growth such as that arising from urban sprawl from one utility's service area to the adjacent utility's area. While we understand more work has to be done to establish the definition and policies for "non-trended" load growth in light of BPA's obligation to plan to serve all NT forecasted load and resources, we appreciate BPA's explicit acknowledgment of the planning obligation it has under its tariff for NT customers, which include many of BPA's preference power customers.	
NRU	With respect to BPA's commitment to providing firm transmission capacity for all NT load growth that is "trended", NRU generally is in firm agreement. NRU understands from the workshop that, provided the NT customer's 10-year forecasted loads remains at or below "trend" (a threshold yet to be determined), BPA will encumber firm transmission capacity to serve such load growth without requiring the customer to participate in upgrades. While BPA's planning obligation under its tariff extends to all NT customer forecasted loads and resources (regardless of "trended" or "non-trended"), where a NT customer forecasts a new Network Resource or forecasts load growth that exceeds the "trended" threshold, NRU understands that such forecasts may require additional study and potential transmission upgrades prior to receiving firm transmission service, consistent with BPA's tariff. We remain interested in engaging with BPA on how it plans to define the threshold for "trended" load growth and the associated policy development necessary to support such a threshold, as well as the process by which BPA will plan to offer firm transmission to designated Network Loads served by new Network Resources. Related to the current 70% certainty threshold and forthcoming definition of "trended" load growth, NRU encourages BPA to consider alternative options to assessing certainty of load, including the potential to eliminate the use of this threshold altogether for planning the transmission system. Given the timeline to construct new facilities, maintaining a 70% confidence level requirement may needlessly impede planning for loads that are more likely than not (i.e., greater than 50% probable) to occur. NRU looks forward to opportunity to discuss alternate approaches, and would appreciate a more robust discussion on this issue.	Thank you for your comment. BPA intends to use the LaRC for the commercial process evaluation which is not subject to the 70% load forecast likelihood criteria. We are evaluating the 70% load forecast likelihood criteria in other transmission planning processes and we will address this in subsequent TPR workshops. BPA intends to provide a response to utilities as part of our annual LaRC process to indicate how much load will be eligible for firm transmission. The response will also indicate what FTSRs have been referred to study.
NRU	NRU looks forward to the upcoming discussions on how BPA may define "trended" and "non-trended" NT load growth. We also encourage any consideration of the use of a replacement probability/likelihood threshold (i.e., today's 70% load probability) to be embedded within these discussions given the relationship between these aspects and for the sake of efficiency. Regarding potential revisions to the load	BPA intends to use the LaRC for the commercial process evaluation which is not subject to the 70% load forecast likelihood criteria. We are evaluating the 70% load forecast likelihood criteria in other transmission planning processes and we will address this in subsequent TPR workshops.

Commenter	Summary of Comment	BPA Staff Response
	and resource forecasting process, NRU would support revisions that simplify the process and format, where possible, including simplifying the form and process for utilities with no anticipated load or resource changes. Given the importance of load and resource forecasts to BPA's tariff obligation to plan to serve NT customer load growth, any proposed process modifications should ensure that the necessary information continues to be provided to BPA in a timely manner and is at a sufficient level of detail for use by BPA transmission planners. NRU recommends that discussion of potential enhancements to the load and resource forecasting process and supporting documentation occur through the ongoing NT Focus Group and BPA meeting series, as those meetings allow for efficient engagement on issues that specifically pertain only to BPA's NT customers.	Thank you for your comment regarding updates to the LaRC.
PPC	Similarly, this process needs to progress with upcoming power supply contracts in mind. Preference customers will soon be signing their Provider of Choice contracts and making selections related to how they plan to meet their needs with a mix of federal and non-federal resources. In order to make the best decisions to serve their communities, those utilities must have certainty about how different resource options, including federal power products, are planned for and delivered via BPA's transmission system. This makes it vital that BPA map out its transmission planning approach in a timely manner.	Thank you for your comment. We will address this concern during the July 9-10 workshop.
NT Customer Group	We are also cautiously interested in further exploring BPA's concept of "on-demand" transmission service. As we understand it, based on BPA's oral description during the April 21st workshop, this concept will guarantee firm encumbrances for "trended" NT load growth without requiring those customers to participate in any transmission upgrades. However, much more detail and discussion is required regarding how BPA proposes to define and apply the "trended" and "non-trended" NT load growth concepts, particularly in circumstances where an individual NT customer provides its total forecasted load growth (inclusive of both the supposed "trended" and "un-trended" components) early and often in its annual load forecast submittals to BPA. Our understanding of BPA's obligations is that it must plan to serve on a firm basis all such load growth reasonably forecasted by its NT customers, not just select components of it.	BPA will continue to plan for forecasted load growth. Industry trends of massive amounts of load growth require BPA to evaluate how to plan for large load increases that require incremental capacity increases on the transmission system. BPA intends to offer long-term firm service for loads that are considered trended based on the final proposal for the NITS Access to Transmission Capacity workshop series. Loads that are considered non-trended will go through the commercial planning process which may require a study to identify the best way to provide firm service. If it's determined that a plan of service or corrective action plan is necessary, the Customer has the option of interim service. Interim service will be less than firm service available to the Customer until long-term firm service is available.

IX. Readiness Related Comments

Commenter	Summary of Comment	BPA Staff Response
NIPPC/RNW	During the workshop, BPA indicated that one requirement might be a contractual commitment between a load and a resource. NIPPC and RNW are concerned about this proposed requirement pending further clarification. Any requirement for a contractual commitment would likely require coordination with state commissions and the load serving entities under their jurisdiction to ensure that the requirements of procurement processes are consistent with BPA's new model. Currently, most RFPs in the Northwest require customers to demonstrate that their bid is supported with transmission rights (usually firm point-to-point transmission service) to even be eligible to submit a bid. Unless this prevailing requirement changes, BPA should not require customers to have an agreement in place as a condition. NIPPC and RNW encourage BPA to solicit input from state commissions as part of this process. NIPPC and RNW are also concerned that a contractual commitment between a load and resource may discriminate against certain business models. While delivering energy from a specific generation resource to a specific load is one legitimate use of the transmission grid, it is not the only legitimate use. Energy traders may plan to purchase energy from a wide range of suppliers and deliver to a wide range of loads; the day-ahead energy markets BPA is considering joining provide financial hedging opportunities to customers with longer term firm transmission rights. Finally, a requirement for a contractual commitment between a load and resource could negatively affect wholesale competition if it simply encourages vertically integrated load-serving entities to contract with themselves for utility-owned assets. NIPPC and RNW would strongly discourage any transmission provider, including BPA, from creating such a mechanism that would suppress supply-side competition.	• BPA acknowledges the need to work with regulators to gain support for the on-demand transmission model as well as LSEs who are carrying out Requests for Proposals to acquire resources. Input from state regulators and LSEs is welcome and encouraged. BPA is also interested in pre-agreement steps that parties who are making a purchase arrangement would go through. Please provide feedback regarding formal steps that indicate commitment to a purchase arrangement that are taken prior to finalizing the purchase. • BPA acknowledges that the market values the flexibility of having long-term firm transmission to support energy marketing flexibility. BPA is working to determine its final long-term planning stance toward transactions that support that flexibility. Input regarding the articulated options is welcome and encouraged. • For bilateral transactions, BPA's planning needs for long-term firm transmission service requests do not vary for vertically integrated utilities versus developers. The anticipated requirement for maturity of generation interconnection will be applied in the same manner in either case.
NIPPC/RNW	Another topic that NIPPC and RNW hope is addressed in this process is the relationship between the interconnection cluster study process and requests for transmission service in both the transition and future states. NIPPC and RNW acknowledge that interconnection service and transmission service are not linked. Nevertheless, BPA customers who develop new generation resources must manage both processes. If the transmission request process does not consider the interconnection cluster study process whatsoever then there is a potential for inconsistencies in the requirements or timing of the two processes that increase the potential for unintended negative outcomes. At the very least, BPA must consider and anticipate that the release of an interconnection cluster study may result in a spike in requests for "on demand" transmission service. The process should also explore whether there are opportunities BPA to incorporate elements of the reformed interconnection process (including scalable plans, and potential aggregation of resources and of loads into cluster areas for purposes of completing the transmission studies).	• BPA appreciates the observation regarding relationship between the interconnection cluster study process and long-term firm transmission service request planning process. • BPA appreciates the observation regarding the relationship between the interconnection cluster study process and long-term firm transmission service request planning process. BPA is considering the relationship and timing of the two processes. • While the completion of a GI cluster study will increase the number of projects that can meet the generation interconnection maturity requirement, the additional requirement for agreement between the buyer and seller will also need to be met under the TPR model. Further

Commenter	Summary of Comment	BPA Staff Response
		consideration is being provided form transactions involving NWHUB, MIDCRemore and 1:1 paths into/out of the balancing authority area.

X. Interim Service (previously referred to as "On-Demand Service") Related Comments

Commenter	Summary of Comment	BPA Staff Response
Puget Sound Energy	In principle, we support BPA's proposal to change to an On Demand Service that will speed up the award of bridge conditional firm transmission service to customers who have an achievable commercial path to place a generating resource into service. This would be consistent with BPA's recently adopted large generator interconnection process to prioritize projects that are commercially ready.	Thank you for your comment.
Puget Sound Energy	At this time, there were few details shared about the proposed reforms and we look forward to opportunities for additional discussions and input during future meetings. We do want to emphasize that an award of bridge conditional firm service would need to include full rollover rights. Absent full rollover rights, PSE and developers would be unwilling to risk starting construction and investing hundreds of millions of dollars in capital.	The only time BPA foresees considering the limitation of rollover rights is when we have a forecasted NITS need that would be enabled through future release of PTP capacity. If this is determined to be the case at the first award of PTP transmission service, the customer will be informed, and be able to make a decision regarding whether the limitation on rollover is acceptable, prior to executing a transmission service agreement.
Seattle City Light	BPA should not devalue future Point-to-Point transmission service by limiting PTP rollover rights.	The only time BPA foresees considering the limitation of rollover rights is when we have a forecasted NITS need that would be enabled through future release of PTP capacity. If this is determined to be the case at the first award of PTP transmission service, the customer will be informed, and able to make a decision regarding whether the limitation on rollover is acceptable, prior to executing a transmission service agreement.
NIPPC/RNW	NIPPC and RNW also note that a five-to-six-year timeline from request to service will require BPA to engage in advance planning to meet the future needs of Point-to-Point customers. As noted above, NIPPC and RNW recognize that BPA has an affirmative obligation to plan to meet the needs of its Network transmission service customers (and that obligation is independent of whether those customers purchase all or some of their energy from BPA). But NIPPC and RNW also recognize that a future state that envisions BPA engaging in "pro-active" planning to provide new transmission service "on demand"	If, once the details of interim service (previously referred to as "On-Demand" service) have been clarified, customers determine that a "less than firm" offer does not meet their needs, the short-term firm market remains available to enable service subject to ATC availability.

Commenter	Summary of Comment	BPA Staff Response
	for Point-to-Point customers will require BPA to identify plans of service and begin their development before receiving requests for transmission service. This commitment to plan in advance of Point-to-Point customer need will probably not be identical to the obligation to plan for Network customer need, but the scope of BPA's commitment to plan for Point-to-Point customers must be defined so that customers know whether they can rely on BPA to provide them with transmission service "on demand" or whether they must rely on some other process to ensure that they have the service they need when they need it.	

NIPPC/RNW	To deliver on its vision of providing "on demand" transmission service, BPA will need to develop a set of criteria and requirements that customers must meet to request and receive transmission rights on facilities enabled under this new paradigm. At this point, NIPPC and RNW do not have any specific recommendations but simply suggest the following options for consideration:
	• Queue order;
	• Lottery/Rationing[2];
	• Auction (could include any of the following):
	  ○ Upfront payment (premium);
	  ○ Term of service;
	  ○ Start date;
	  ○ Rate (including indication of willingness to pay an incremental rate); or
	  ○ Other factors;
	• Network Open Season (negotiation plus auction); and
	• Other options raised by other stakeholders or BPA.
	
	In evaluating these and other allocation options, NIPPC and RNW encourage BPA to consider the following principles:
	• The allocation should be neutral between Point-to-Point and Network service;
	• The allocation should be neutral between federal and non-federal resources;
	• The allocation should be neutral between business models (energy traders need transmission rights just as much as developers of new generation resources).
	
	[2] While both a lottery or rationing mechanism could be non-discriminatory, NIPPC and RNW would oppose them as mechanisms to allocate transmission rights; allocating valuable and scarce transmission rights either of these ways would likely not meet the needs of BPA's customers.
		Thank you for your feedback. BPA will consider cost sharing mechanisms/direct assignments to minimize cost shifts to other customers, in addition to queue order.

Commenter	Summary of Comment	BPA Staff Response
NIPPC/RNW	NIPPC and RNW also recommend that BPA develop a defined set of criteria that customers must meet to request transmission service on an "on demand" basis. NIPPC and RNW recognize that customers requesting service under this new model will not have contributed to the costs of the transmission, NEPA, or preliminary engineering studies when the request service on facilities enabled by this new model. Instead, BPA will have paid the costs of this preliminary work up front. To avoid cost shifts to existing customers who do not need service on these upgrades, NIPPC and RNW recommend that any customer seeking service on these upgraded facilities should reimburse BPA for an appropriate portion of the costs of the transmission study, NEPA and preliminary engineering studies.	Thank you for this feedback. BPA will consider cost sharing mechanisms/direct assignments to minimize cost shifts to other customers.
NRU	In addition, NRU generally supports BPA's commitment to provide "on-demand" transmission service where there is insufficient long-term firm transmission capacity as a bridge to long-term firm service through upgrades, through some form of less-than-firm service. NRU understands that, currently, BPA's options for providing priority 6 service are either through secondary network (6-NN) service for its NT customers, or conditional firm service (6-CF) to its PTP customers. While each of these services is "less firm" than long-term firm, they are hardly equitable in terms of risk. For example, PTP customers that take conditional firm service have priority access through automatic allocation of any short-term firm capacity before such capacity is released to the market for sale (see Section D.1.b of the Conditional Firm Service Business Practice). All else being equal, this appears to place NT customers at a potentially severe disadvantage at accessing short-term firm capacity and could even subordinate NT load service to conditional firm PTP service in situations of firm transmission scarcity. NRU underscores the importance of this issue as BPA's preference customers prepare to make near-term decisions regarding the designation of new (non-Federal) Network Resources or purchasing Tier 2 service from BPA Power Services. NRU strongly recommends that BPA identify options for remedying this discrepancy as it moves closer to implementing its vision of "on-demand" transmission service.	BPA plans to share potential principles for offering less than firm service in a manner that addresses risks associated with both NITS and PTP service.
NRU	NRU also understands and supports BPA's proposal to limit the opportunity for rollover for new long-term firm PTP contracts or conditional firm contracts, to the extent that such contracts would require capacity held aside for the reasonably forecasted NT customer load growth. This limitation of rollover is directly tied to BPA's obligation to set aside existing transmission capacity to meet reasonably forecasted NT load growth over the planning horizon, as outlined in FERC Order No. 888. As a result, BPA's proposal to limit the opportunity for rollover for new long-term firm PTP contracts or conditional firm contracts is imminently reasonable and a natural and foreseeable outcome of this obligation. To be clear, any characterization that BPA would be rescinding or otherwise taking away capacity from parties through	Thank you for this support, acknowledgement, and suggestion.

Commenter	Summary of Comment	BPA Staff Response
	this rollover provision is flawed; rather, it is NRU's understanding that BPA is proposing to offer—at the outset of service—the existing firm available capacity remaining on its system until such time as the NT load is forecasted to require the capacity that BPA previously set aside. As part of implementing this proposal, NRU recommends that BPA make transparent (to the extent it is not already) forecasted NT load growth as it relates to BPA's posted available transmission capacity, such that it is indisputable the point at which NT load growth is forecasted to increase where available capacity in the later portion of the planning horizon is depleted. While we understand that this prospect of limitations on rollover may appear alarming to certain of BPA's transmission customers, NRU is uncertain of the eventual likelihood that BPA will in fact be in a position to limit the rollover of new PTP contracts. If BPA is successful in executing its vision of proactively planning the transmission system in advance of its transmission customer forecasted load, NRU understands that this should significantly mitigate the need for BPA to limit the rollover of new PTP service.	
Tacoma Power	Tacoma Power requests that BPA reconsider its positioning on limiting the PTP rights of preference customers in subordination to NITS preference customers. All preference customers meet BPA's definition of Native Load Customers and should be treated similarly for the provisioning of transmission service. Tacoma Power believes that this incremental improvement is readily actionable by BPA. Tacoma Power does also recognize the need for and support BPA's efforts in improving its transmission planning processes and remains engaged in the continued discussion.	The only time BPA has or will limit rollover rights is when we have a forecasted NITS need that would be enabled through future release of PTP capacity. If this is determined to be the case at the first award of PTP transmission service, the customer will be informed, and able to make a decision regarding whether the limitation on rollover is acceptable, prior to executing a transmission service agreement.
NT Customer Group	Another component of its "on-demand" transmission service, BPA plans to offer transmission service (most likely some form of non-firm transmission service) in response to all new transmission requests where BPA lacks firm transfer capability, until such time as BPA completes the necessary transmission solution(s) to provide firm capacity. Although we await further details, we appreciate BPA's commitment to expanding the levels of transmission service that it may be willing to offer in circumstances where it lacks long-term firm capability. For instance, more expansive access to 6NN service would help BPA and Load Responsible Entities meet the transmission component of the WRAP forward showing requirements. However, we reiterate concerns that 6NN service is not comparable in value to PTP conditional firm transmission in the SPP Markets+ context, since congestion rents are allocated to PTP conditional firm service, but not allocated for 6NN transmission used by NT customers.	Please see the Day-Ahead Market Policy and Day-Ahead Market Record of Decision and located at: https://www.bpa.gov/learn-and-participate/projects/day-ahead-market BPA plans to share potential principles for offering less than firm service in a manner that strives for comparability between NITS and PTP service.

Commenter	Summary of Comment	BPA Staff Response
NT Customer Group	Additionally, we note that the value of BPA's on-demand transmission service will likely correlate to the total amount of such service accepted by customers – the higher the customer acceptance, the higher the likelihood that such customers will face curtailments of their service during periods of congestion. This will heighten the interest and importance of BPA succeeding in its capital project execution to install facilities that increase available transfer capability. Moreover, PTP conditional firm service is automatically afforded access to any short-term firm ATC prior to it being released to the market for other uses, including for 6NN service. As a result, the NT Customer Group believes that 6NN service is not adequately comparable in value to PTP conditional firm service. We request BPA explore opportunities to mitigate this disparity as part of clarifying its "on-demand" service proposal. In general, we also support BPA's proposal to require transmission customers to identify both the resource and load to be served as a requirement to accessing the queue and "on-demand" transmission service.	BPA plans to share potential principles for offering less than firm service in a manner that strives for comparability between NITS and PTP service.

XI. Proactive Planning Related Comments

Commenter	Summary of Comment	BPA Staff Response
Columbia River PUD	CRPUD recognizes that overcoming the hurdles to achieve this will not be easy. We believe that BPA has the tools to meet this goal. On slide 6, you mentioned proactive planning. This is the number one criterion that should be further developed to ensure execution, and we believe BPA has a solid starting process. Efforts like the Portland Area Reinforcement Study (PARS) are key to success. BPA should conduct this type of study, which is highly collaborative with stakeholders, and then integrate it into the project once a construction need is identified, whether through an Attachment K, LLIR, TSEP, or another BPA study. This will ensure BPA builds sufficiently, instead of merely meeting today's needs without considering tomorrow's requirements.	BPA is working to create a collaborative process to engage all stakeholders as we develop our proactive planning approach.
Columbia River PUD	One item that may help BPA achieve success is incorporating a 20 to 30-year forecast.	BPA currently incorporates 20-year forecasts into the economic models and is developing 20-year powerflow models to add to our planning process. The success of this process will hinge on stakeholders providing inputs to the forecasts.
Columbia River PUD	We are truly excited about BPA's plan to implement a proactive planning model that will look to identify no-regrets projects based on anticipated demand and resource-rich areas. CRPUD hopes that resource-rich areas would be considered areas with significant industrial land holdings that have experienced tremendous development interest but have been passed over due to limited transmission capacity.	BPA thanks CRPUD for this comment. BPA will be working with stakeholders and supplied forecasts to develop the key expansion drivers for the region. The drivers will inform the scenarios used in the proactive planning analysis. This input will be useful.
Big Bend Electric Cooperative	Supports BPA's proposed long-term, 20 year, scenario-based transmission planning process. Although we await additional detail on this approach, we believe that planning the transmission system based on the forecasted load of BPA's transmission customers is an improvement over the status quo and will more likely identify cost effective transmission upgrades necessary to ensure reliable load service over the long-term horizon.	BPA thanks Big Bend for this comment. BPA will be working with stakeholders and supplied forecasts to develop the key expansion drivers for the region. The drivers will inform the scenarios used in the proactive planning analysis. This input will be useful.
Seattle City Light	BPA should use probabilistic analysis in long-term transmission planning.	BPA thanks SCL for this comment. BPA is evaluating aspects of probabilistic planning that can be incorporated to enhance 20-Year Scenario planning.
Seattle City Light	BPA should use the principle of least regrets when designing and selecting transmission expansion projects. We suggest BPA consider a robust main grid designed for the needs 20 years in the future.	BPA thanks SCL for this comment. BPA agrees and is building a 20-year scenario planning based process to identify main grid projects of least regret.

Commenter	Summary of Comment	BPA Staff Response
NIPPC/RNW	NIPPC and RNW also suggest that the process should result in plans of service that expand BPA's grid in a rational and cost-effective cadence. Neither BPA nor its customers can afford to build every upgrade that will be needed in 20 years all at once. Expanding the system in rational phases will likely mean that new generation projects in some regions will have to wait longer for upgrades that allow them to have "on demand" service under this new paradigm. How BPA determines to phase the expansion of its system will be of critical importance to developers (and their potential customers). At some point, BPA will need to prioritize transmission expansion to one or several regions while other regions and the potential generation projects located there must wait for subsequent phases. Not all customers are likely to agree with BPA's decisions in identifying which regions will be prioritized. Accordingly, BPA will need to have clear, consistent, and transparent decisionmaking criteria that it will apply as well as opportunities for meaningful stakeholder input into the decision.	BPA thanks NIPPC/RNW for this input and is evaluating a phased expansion approach. We are evaluating prospective process changes that will include the transparency of our project identification and selection.
NIPPC/RNW	NIPPC and RNW also recommend that BPA include a mechanism under which transmission customers can proceed – at their own cost and risk - with transmission expansion outside of the proactive planning approach. BPA's vision of the future of transmission planning should include space for private capital to develop transmission projects in the region on its own timeline, including accelerating construction of projects that BPA has identified for future expansion. NIPPC and RNW believe that deployment of private capital to expand the regional transmission grid should be facilitated. Even if such an option is outside the scope of this process, NIPPC and RNW encourage BPA to explore how it can leverage private capital and merchant transmission development as part of BPA's overall transmission expansion planning process for the region.	BPA is considering a process to allow private funding of transmission system expansion.
NIPPC/RNW	To successfully deliver the vision where BPA can provide transmission service essentially on-demand, or alternatively within five to six years from a customer's request for service, BPA will need to resolve a number of important questions, many of which were addressed in the White Paper. BPA will need to adopt as part of planning for its own system many of the planning processes that FERC required regional planning entities to implement as part of Order 1920, given the regional nature of BPA's transmission system and BPA's own unique backbone transmission provider role in the Northwest. NIPPC and RNW look forward to working with BPA to develop a planning process that considers multiple possible future scenarios on ten- and twenty-year time frames and that incorporate state energy policy goals as part of the planning assumptions. FERC already requires regional planning entities to incorporate these new planning processes – NorthernGrid, of which BPA is a member, is currently developing its compliance filing to implement FERC's Order 1920 reforms. BPA has also voluntarily engaged in the WestTEC planning process which has also incorporated many of these broader ranging and longer-term elements into its planning process. NIPPC and RNW are confident that BPA can build on this initial experience with	BPA is in the process of coordinating with NorthernGrid members to evaluate Order 1920 with the expectation of adopting the reforms in a manner that is consistent with the existing structure and governance in place at NorthernGrid. BPA's efforts to evaluate alignment to Order 1920's reform include consideration of the use of 20-year scenario planning analysis.

Commenter	Summary of Comment	BPA Staff Response
	these new planning methods to identify plans of service for transmission expansion farther in advance of the region's actual need for new transmission. NIPPC and RNW look forward to working with BPA and other regional stakeholders to develop the processes necessary to achieve this vision. As we work to develop more robust plans for the future, it will be important to bear in mind that the process of transmission planning and identifying plans of service is not a decision to proceed with development.	
NIPPC/RNW	NIPPC and RNW also anticipate that as part of the future state BPA has envisioned, BPA will need to identify the key decision points in considering whether to proceed with development of new transmission lines. One key decision point will be whether BPA commits to fund on its own preliminary work such as NEPA and preliminary engineering in anticipation of future construction. Given the five-to-six-year timeline that BPA envisions, we anticipate that BPA will need to fund (at least initially) this preliminary work. Because BPA will be incurring costs, NIPPC and RNW encourage BPA to commit to a transparent process and a defined decision-making framework (with opportunities for meaningful stakeholder input) that BPA will use in deciding whether to proceed with preliminary development work. Upon completion of this preliminary work, BPA will also face a decision about whether to proceed with construction. Again, NIPPC and RNW encourage BPA to commit to a transparent process with a defined decision-making framework that BPA will use in reaching a decision to move forward with construction. Like the preliminary decision point, stakeholders should have the opportunity to provide input to BPA as it considers its options. NIPPC and RNW look forward to BPA providing more detail regarding the criteria it will apply when making decisions on whether BPA will commit to begin preliminary work (such as NEPA) and when making decisions on whether BPA will begin construction on a plan of service. Such criteria have been shared and applied by BPA in the two tranches of Evolving Grid projects, both of which are very positive commitments by BPA that NIPPC and RNW support, but the actual application of these criteria remains somewhat of a black box exercise from our perspective.	Thank you for this comment. It is taken into consideration and will be addressed in future workshops.
NRU	NRU strongly supports BPA's conceptual proposal to adopt a proactive transmission planning process. Specifically, we agree with BPA's proposal to identify transmission needs primarily based on anticipated load growth of its transmission customers under a diverse set of scenarios and informed by requests in its transmission queue. Relying on transmission requests as the sole or primary basis for identifying transmission infrastructure, when the aggregate demand of such transmission requests exceeds multiples of peak regional loads, is a poor indicator of probable transmission need and more likely produces illogical and unactionable study results. Instead, planning based on forward-looking, long-term	BPA thanks you for this support of our proposal.

Commenter	Summary of Comment	BPA Staff Response
	scenarios that rely more heavily on forecasted load as the starting foundation will result in more cost effective and efficient transmission solutions to meet BPA transmission customers' long-term load service needs, including that of BPA's NT customers.	
NRU	With respect to the development of long-term scenarios, NRU requests that BPA at a minimum review and discuss the inputs and assumptions that it intends to use in its proactive transmission studies in an open and transparent stakeholder process, whether through the Transmission Planning Reform series or otherwise. Given the criticality of these assumptions on the identification of transmission needs and solutions, they must be evaluated through a regional stakeholder process. Further, we recommend that BPA rely on load forecasts provided by its transmission customers as much as possible in establishing its load growth assumptions, including through any additional engagement that may be necessary to determine assumptions beyond ten years. Beyond its transmission customers, we would also support BPA consulting with the state commissions or other state regulatory agencies with the authority to approve the integrated resource plans ("IRPs") of investor-owned utilities ("IOUs") or other utilities that are BPA transmission customers. This not only will help inform the development of scenarios and assumptions—since BPA's point-to-point ("PTP") customers are not obligated to provide load forecasts to BPA—but allowing state entities to help inform demand-side assumptions (such as state laws affecting demand or anticipated load growth) can also help allay concerns that BPA is unilaterally identifying critical assumptions on behalf of its transmission customers.	BPA intends to initiate a cyclical process of stakeholder engagement to develop and update system expansion drivers as well as develop 20-year scenarios for expansion studies. BPA is considering the increased acceptance and use of complete customer load forecasts in it system expansion studies in the 20-year time frame. BPA also appreciates and will consider NRU's suggestions on capturing potential demand on the system in the 20-year time frame.
NRU	For similar reasons we recommend BPA consider consulting with state regulatory bodies, in addition to the utilities themselves, as it relates to supply-side assumptions, such as resource locations, types, and quantities for purposes of satisfying utility IRPs and corresponding requests for proposals ("RFPs"). Given the influence on and relationship between these utility processes and BPA's transmission queue, BPA should seek to avoid making determinations in a vacuum for how utilities will meet resource procurement requirements. Insofar as practicable, BPA should consider leveraging state-driven feedback in determining the quantity and locations of new resources that should be included in its studies for meeting the loads of IOUs. The benefits of this are twofold: it would not only potentially help to constrain the resource zones and volume that BPA would study to a level more aligned with utility IRPs and RFPs, but also help alleviate allegations or concerns over BPA picking "winners and losers" from its queue. BPA should strive for an appearance of impartiality and avoid "putting its thumb on the scale" of regional resource development as much as possible to avoid time-consuming and contentious outcomes of its proactive study process. As a complementary approach to consulting with state regulatory entities, NRU encourages BPA to also consider implementing caps or constraints on the total requests or capacity that it will include in its proactive studies, tied to the forecasted demand. These types of approaches	Thank you for this comment. It is taken into consideration and will be addressed in future workshops.

Commenter	Summary of Comment	BPA Staff Response
	have been approved for transmission providers in other regions, for example such as constraining the studied areas to 150% of capacity availability (CAISO) or limiting the studied demand no more than 50% of non-coincident peak for each load area (MISO). Although associated with generator interconnection processes, these policies were implemented to mitigate nearly identical concerns that BPA faces—specifically, responding to a queue that far exceeds rational load projections.	
NRU	We agree with BPA's proposal to plan based on a 20-year horizon, for many reasons. Such a horizon not only aligns with Long-Term Regional Transmission Planning requirements as outlined in FERC Order No. 1920, but also is consistent with the horizon under which many northwest investor-owned utilities conduct integrated resource planning pursuant to state regulatory requirements. To this end, a recent white paper from WECC's Long-term Transmission Planning Task Force identified that most load serving entities create a 20-year outlook for load, and WECC therefore also intends to collect and validate 20-year forecast data from member entities to help facilitate long-term planning studies. We note that a 20-year horizon aligns with that used in other planning contexts within the region, such as WestTEC's Westwide long-term transmission study and the Northwest Power and Conservation Council's development of the Ninth Power Plan. Moreover, evaluating transmission needs over a 20-year horizon should facilitate BPA's ability to address a larger volume of queued transmission requests than relying on a shorter horizon that represents a more condensed period of load growth. Lastly, given the general timeline to develop and construct significant transmission infrastructure, including conducting any necessary environmental review, planning for transmission needs beyond ten years is increasingly prudent.	BPA thanks you for this support of our proposal.
NRU	Regarding the frequency of proactive transmission studies, NRU supports the concept of BPA establishing a repeatable process to validate prior study findings and run subsequent studies to identify additional long-term transmission needs. Though we leave the frequency of conducting such studies to the discretion of BPA, we encourage BPA to monitor the ongoing need for a biannual study process, as proposed at the workshop, in consideration of BPA staff resources and the incremental value of doing so. As briefly discussed in FERC Order No. 1920, adhering to a higher frequency of updating assumptions and conducting multi-scenario, 20-year planning studies could prove administratively burdensome, and the incremental benefits of updated assumptions every two years may not outweigh that burden.	Thank you for this comment. It is taken into consideration and will be addressed in future workshops.

Commenter	Summary of Comment	BPA Staff Response
NRU	NRU also understands from the workshop that BPA anticipates evaluating potential transmission solutions on a least-regrets basis. We request that BPA commit to engaging with customers and stakeholders in an open and transparent process to develop BPA's evaluation criteria, whether least regrets or otherwise, including the benefits that BPA will use in evaluating such transmission solutions (e.g., additional revenues, reliability, and/or resilience benefits). NRU suspects that the development of this methodology may be best deferred to a future stakeholder engagement process but wishes to highlight the importance of these criteria as it relates to future ratepayer impacts associated with these types of transmission solutions.	BPA thanks NRU for this comment. BPA intends to initiate a cyclical process of stakeholder engagement to develop and update system expansion drivers as well as develop 20-year scenarios for expansion studies. We are evaluating prospective process changes that will include the transparency of our project identification and selection.
NT Customer Group	We encourage creative and unique proposals, provided that BPA maintains as a primary focus its statutory obligations to its preference customers, including those taking Network Integration Transmission Service (NITS). To that end, we support the concept that BPA shared regarding its "proactive" planning model. Specifically, we very much support BPA prioritizing load forecasts and load service as the foundation of its long-term transmission studies, as opposed to transmission requests serving as the centerpiece. The transmission infrastructure necessary to ensure reliable, long-term load service should be informed by BPA's queue—not driven by it. While we expect additional details regarding the proactive planning approach, we generally support BPA's proposal to use a long-term (at least 20 years) study horizon. This will help ensure that BPA will avoid being short of transmission capacity as its customers' loads grow into the future. Further, we encourage BPA to evaluate transmission solutions resulting from its proactive planning process in an open and transparent manner, given the impacts of such transmission solutions on the rates of all of BPA's transmission customers.	Thank you for this comment. It is taken into consideration and will be addressed in future workshops.
PPC	Regional load service must be central to the agency's efforts. Prioritizing projects needed for regional load service is mostly likely to result in the identification of "no regrets" projects, reducing financial risk for the region as a whole. It would also allow BPA to continue to meet its statutory obligations which are foundational to this discussion. In BPA's next public workshop, PPC would like to hear more about how the agency plans to ensure these statutory obligations will be met in a new planning paradigm. The transmission reform conversation is occurring at a time of other transformational changes at BPA – most notably the offering of Provider of Choice contracts and the planned participation in Markets+. The approach adopted for transmission reform must be informed by and be compatible with the outcomes of these other initiatives. These are among the principles that PPC has adopted for BPA's transmission reform. We offer these principles for BPA's consideration (see attached) and look forward to discussing them in more detail with the agency.	Thank you for this comment. It is taken into consideration and will be addressed in future workshops. With respect to BPA's statutory obligations, this planning reform effort is intended to position BPA to continue to satisfy those obligations in the future given the significant changes mentioned as well as other changes and trends in the industry. For example, with new long-term power sales contracts being signed, proactive planning and other elements of the reform effort are being designed to ensure there is sufficient capacity for the transmission of federal power to meet these contractual obligations. BPA acknowledges the need to consider its obligations as it proposes new processes and looks forward to further discussion in the coming workshops.

XII. Transmission Expansion Acceleration (previously referred to as "Project Execution") Related Comments

Commenter	Summary of Comment	BPA Staff Response
NRU	NRU greatly supports BPA's efforts as it relates to project execution, including use of its Secondary Capacity Model and expanding the opportunities for customer-led expansion. We appreciate and support BPA's goal of providing service within 5-6 years of the customer's request, including where upgrades are required. We also recognize that to achieve this ambitious target, all options must be on the table. We encourage BPA to continue seeking all possible avenues to expedite the completion of transmission infrastructure projects, while not sacrificing its standards for compliance and reliability obligations. While the use of alternative or expanded sources of construction alternatives may present higher incremental costs, we anticipate that the benefits of ensuring reliable load service and avoiding load loss events would be far greater. We remain interested in engaging with BPA on issues around capital execution and the various alternative methods by which the region can realize new transmission infrastructure at a necessary pace.	We appreciate your support and look forward to further engagement.
NT Customer Group	Lastly, we very much appreciate BPA's attention to project execution. In order to deliver on its vision of building to serve new requests within 5-6 years, BPA and the region must explore every possible opportunity to construct new facilities. We applaud BPA for considering a wide range of options beyond the status quo, including the potential to permit its customers to build necessary facilities and fully leveraging its secondary capacity model. To be clear, this is an incredibly ambitious goal to have – and we remain committed to supporting any and all efforts to enable efficient infrastructure development, while acknowledging BPA's obligations regarding its reliability and compliance standards.	We appreciate your support and look forward to further engagement.

XIII. Miscellaneous Comments

Commenter	Summary of Comment	BPA Staff Response
Seattle City Light	BPA should prepare to join a Regional Transmission Organization while meeting its statutory obligations.	BPA has signed its intention to join the Markets+ DAM. The decision to join an RTO is not within scope of this process.