

Brookfield Renewable Comments on BPA's Draft Language for its Grid Access Transformation Project

Brookfield Renewable Trading and Marketing LP (BRTM) and Brookfield Renewable Energy Marketing US LLC (BREMUS), collectively, Brookfield Renewable, appreciate the opportunity to provide these comments on the Bonneville Power Administration's (BPA's) draft language for its Grid Access Transformation (GAT) project.

Readiness Criteria and Fallback Plan – As stated in Brookfield Renewable's previously submitted comments, Brookfield Renewable generally supports BPA's adoption of readiness criteria for firm transmission requests. Among other details, and as detailed in the draft language, BPA's proposed readiness criteria include a requirement that any new generation have an established plan of service and that, for bilateral transactions, the customer must provide evidence of transaction maturity. Acceptable evidence of a mature transaction includes any one of the following:

- Power Purchase Agreement;
- Letter of intent signed by both parties;
- Notice of award from a request for proposal; or
- Security.

In response to customer comments, BPA added the option to post security to meet the requirements. The security requirements are based on the transmission service requirements (not the costs of needed upgrades, like today). While Brookfield Renewable supports the adoption of fairly stringent readiness criteria, Brookfield Renewable does not oppose the inclusion of the security option. As noted in its previous comments, Brookfield Renewable remains concerned that reliance on security requirements may alone not eliminate more speculative, less mature, firm transmission requests.

Notwithstanding Brookfield Renewable's qualified support for the proposed readiness criteria outlined in the draft language, Brookfield Renewable recommends that BPA add additional language to address the circumstance where, after application of the above readiness criteria, the transmission queue is not substantially reduced, at least for the transition period. As discussed at the July 9-10, 2025 workshops, if the existing 65GW transmission queue is not substantially reduced after application of the readiness criteria, BPA could still be faced with a queue that is too large to study/solve and/or one where it is not viable to provide conditional firm service (CFS) to all applicants. At the workshops, BPA started that, at that point, it may have to study the remaining queue in "batches." Brookfield Renewable is concerned that, depending on the criteria used to "batch" requests, that

approach may still result in study clusters too large to solve or that result in an unnecessary comingling of mature and less mature transmission requests. As an alternative or fallback plan, Brookfield Renewable recommends that BPA instead rely on reapplication of more stringent readiness criteria. For example, BPA could reapply the above criteria, absent the security requirement option. Other options could include processing requests that have: an executed engineering and procurement agreement; the filing of a notice of intent for permitting; submittal of a “final” state permitting application (e.g., application with Oregon’s Energy Facility Siting Council or EFSC); or evidence of long-lead equipment procurement. While these options are associated with mature generation development requests, these milestones nonetheless indicate a project is ready to request firm transmission service.

In the end, BPA cannot adopt a process that results in a do loop where it is faced with a transmission queue that is too large to study, i.e., is unsolvable and that would take a decade to process.

Conditional Firm Service (CFS) - BPA, as part of both its long-term future state and on a transitional basis, plans to immediately offer CFS to customers before they can provide long-term firm service. As stated in its previously submitted comments, Brookfield Renewable supports BPA’s proposal. The proposed draft language makes clear that the CFS will be potentially curtailable in all 8760 hours and under certain defined system conditions. Thus, it appears, the proposed CFS will be potentially less firm than the CFS offered today. In earlier workshops, BPA indicated that, notwithstanding the fact that the proposed CFS may be curtailable in more hours in a year, BPA does not experience or expect a high degree of curtailments on its system. Brookfield Renewable urges BPA to continue to provide curtailment data that can be analyzed and risk-assessed by customers. Brookfield Renewable also urges to provide granular curtailment data, so that it can distinguish between, for example, forced outages and curtailments that may arise due to congestion, so that it can better assess curtailment probabilities under the proposed CFS. As noted by the Northwest and Intermountain Power Producers Coalition at the last series of workshops, BPA is truly proposing a transformation of its transmission planning and request process; a transformation that will require socialization and education across both the customer, client (load-serving entity), policymaker, and financial institution communities. To that end, Brookfield Renewable believes that it is imperative that BPA continue to offer and provide “firm” transmission service, albeit on a conditional basis, so that customers can secure necessary financing of their generation projects and satisfy counterparty delivery requirements.

Self-Build Option – BPA’s proposed draft language does not include language pertaining to a customer self-build option for needed new transmission facilities. BPA appears to view this issue as a future state issue and one that will not be addressed and completed until January 2027. Consistent with its previously submitted comments, Brookfield Renewable

urges that BPA immediately address this issue and add draft language on this matter. As previously outlined, Brookfield Renewable recommends that BPA quickly develop and adopt a business practice based on the following process:

- (a) BPA issues off-the-shelf generic design and equipment specifications;
- (b) BPA issues a list of approved engineering and construction companies (EPCs) and environmental consultants;
- (c) The developer contracts with EPC/consultant to advance surveys, design, permitting and long-lead equipment order;
- (d) The EPC completes design, obtains final BPA approval (must be subject to time limit), and proceeds with construction at developer cost; and
- (e) Once constructed and accepted by BPA, but prior to being placed in service, assets are transferred to BPA ownership.

Brookfield Renewable reiterates that it is imperative that BPA quickly establish a self-build business practice (building off the already established BPA tariff authority). Establishing such a practice now will help ensure that customers have a suite of tools available to meet the new and recently established resource build timelines for securing federal tax credits.

Conclusion

Brookfield Renewable appreciates the opportunity to provide these comments on BPA's draft GAT language. Brookfield Renewable supports the identified objectives of BPA's GAT project and urges BPA to move ahead expeditiously in implementing the proposed GAT reforms.