July 21st, 2025

Bonneville Power Administration
Transmission Service

RE: Comments on BPAs Grid Access Transformation Comments

Introduction:

EDP Renewables (EDPR) submits the following comments in response to the topics raised at Bonneville Power Administration (BPA)'s Grid Access Transformation Workshop on July 9th and 10th 2025. EDPR appreciate this opportunity to work with BPA and other regional stakeholders to improve BPAs transmission planning and related processes.

EDPR understands that there are a variety of transmission customers and business models, and these comments reflect the perspective of an independent power producer who seeks to build new generation to meet growing load.

Ideal Future State:

Across the country the regions that are faring best are the ones that have integrated all the electricity planning and operational processes into a cohesive structure. The key features of these regimes are that they create a consistent, trustworthy, and competitive process that stakeholders can trust. Ultimately, the best way to reduce speculative behavior is to create a process that developers can follow where they know they will be evaluated based on transparent and objective metrics.

The key features of that type of process are:

- Transmission capacity is proactively expanded to meet long-term forecasts.
- Consistent resource adequacy studies and metrics to ensure regional reliability.
- Competitive generation interconnection processes ensure the best projects move forward to resource solicitations.
- Resource procurement frameworks are aligned with the resource, interconnection and transmission service timelines.
- Flow based transmission operation supports regional day-ahead and real time market signals to optimize generation dispatch.

EDPR congratulates BPA staff because they have already completed much of the work required to build each piece of this type of process. The Evolving Grid and WestTEC projects are excellent examples of the types of projects/programs needed to proactively expand transmission capacity. The Western Resource Adequacy Program (WRAP) program contains the shared metrics and

requirement to ensure reliability and respect jurisdictional differences of stakeholders. BPA has refined generation interconnection process over the last year and is now seeking to create a new transmission service process.

Outside of the details of how transmission service will work, the biggest outstanding question is how these processes can be coordinated to enable a competitive development landscape to help the region meet rapidly growing load in the most cost competitive manner.

Interim Service

Competitive Allocation Process for New Generation:

EDPR encourages BPA to allocate interim transmission service to new generators through a competitive process if it cannot accommodate the full volume of service request it has received. A competitive approach will help ensure the efficient allocation of scare transmission capacity.

A comprehensive competitive scorecard could incorporate indicators of commercial interest, such as a short list or power purchase agreement as well as other key project development milestones like land acquisition, permitting, interconnection agreements, and equipment procurement. These categories are verifiable and together provide a more robust framework to assess which projects are best positioned to receive interim service.

This competitive process would ideally be run after a cluster of new generators complete their facilities study and before they execute their Large Generator Interconnection Agreement (LGIA). This would reduce the number of requests because generator's with prohibitively expensive interconnection costs will not seek service because their interconnection impacts and required mitigation costs are studied and known. Based on recent BPA materials, the transition cluster projects are slated to complete their facilities study by Q4 2027, and the first cluster study projects should be completed Q1 2029.[1] Once allocated interim service, new projects are ideally situated to move on to participate in the load serving entities competitive processes with bids offtakers can rely upon for relative cost and timing certainty.

Requests for Clarification/Additional Detail:

EDPR requests the following clarifications on interim service:

- How will BPA preserve the quality of service for existing transmission rights holders if the interim service product is an equal level of service (conditional firm or 6NN) and will create additional congestion?

[1] https://www.bpa.gov/-/media/Aep/transmission/interconnection/GQR-High-Level-Transition-with-Durable-CS-Timelines--3-7-25.pdf

- Can BPA identify whether each of the new and existing interim service offerings are sufficient for load serving entities to utilize to comply with their RA obligations?
- Can BPA specify at what point in the process an entity receiving interim service will know the costs of the firm service and the expected date the interim service will turn firm?
- How does BPA plan to manage transmission delays during the interim service period? Is it possible for a project to lose interim service? How would costs incurred due to delays be identified, managed and assigned?
- How much capacity does BPA believe it can offer as interim service over the next 5-6 years while the future state is stood up?

Alignment of Separate but Interrelated Processes

EDPR implores BPA and its regional partners to work together to align the transmission, interconnection and resource procurement processes so load serving entities conduct their competitive solicitations when each interconnection cluster of projects is ready to be evaluated and there is sufficient near-term transmission capacity for the project to connect without unnecessary delay. Doing so allows new projects to submit the most accurate and complete package into the resource solicitation process to the ultimate benefit of Pacific Northwest ratepayers.

The IPP community has gotten extremely efficient at building projects but the key determinants for whether and how fast a project gets built are the cost and timeline for interconnecting and delivering the power, not building the generating facility. Two reasons IPPs may request transmission service early in the project development process is to ensure sufficient transmission service to support the commercial transaction and to ensure that timelines for power delivery align with project development.

BPA must build out the capacity and then allocate it to the projects that are ready to use it and pay for it on an ongoing basis at the right time in the development process. Getting this right is paramount if IPPs are going to help address the ~ 2 GW of energy capacity deficit the region faces before the transition to the future state is complete.[2] Under this type of structure, regional jurisdictional boundaries can be respected, statutory mandates can be met, and together we can ensure that the lights stay on at the lowest price.

[2] https://www.newsdata.com/clearing_up/supply_and_demand/bpas-load-and-resource-study-shows-energy-deficits-starting-in-2027-and-growing-rapidly-in/article_abae8a72-704c-11ef-a3d7-eb12b0c74b14.html

Conclusion:

Thank you for the opportunity to submit these comments. EDPR looks forward to reviewing BPAs proposed redlines and supporting further enhancement of BPA processes.