



Eugene Water & Electric Board

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EWEB Comments on the August 19, 2026, Grid Access Transformation Workshop

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Submitted via techforum@bpa.gov

Eugene Water & Electric Board (EWEB) appreciates BPA's continued work on the Grid Access Transformation (GAT) initiative and the updates provided at the August 19 workshop. EWEB supports the objectives of GAT and believes this effort presents an important opportunity to make meaningful, effective, and lasting improvements to how BPA plans and delivers transmission service.

EWEB encourages BPA to maintain the momentum and sense of urgency demonstrated through this effort. Customers are willing to make near-term compromises because of their confidence in the long-term vision. We encourage BPA to be creative, efficient, and willing to challenge established processes in pursuing that vision. Where successful approaches already exist within BPA, other utilities, or the broader industry, BPA should consider opportunities to benchmark and replicate them.

Planning Process

EWEB appreciates BPA's efforts to illustrate the planning landscape through the "spaghetti diagram" and Planning Study Matrix. These materials help demonstrate the complexity of BPA's planning processes but also reinforce the importance of considering how those processes work together.

It remains unclear how the various studies interact, influence one another, and ultimately drive outcomes in BPA's Transmission System Plans. EWEB encourages BPA to consider whether existing processes can be simplified, consolidated, or more fully integrated to efficiently address regulatory, tariff, reliability, and customer requirements.

Commercial Transmission Planning

EWEB generally supports the proposed Commercial Transmission Planning principles but questions whether "Mitigate Planning Impact of LSE Minimum Bid Requirement(s)" should be established as a planning principle. Public Generating Pool (PGP) provides additional perspective on this issue in its submitted comments.

Customer Build Option

EWEB strongly supports the Customer Build Option and appreciates BPA's clarification that the proposed timelines represent the latest point at which the respective goals are expected to be accomplished.

Given the pace of customer growth and the objectives of GAT, EWEB encourages BPA to pursue opportunities to accelerate these timelines. BPA has recently demonstrated its ability to make significant changes to the Line and Load Interconnection Procedures and Network Integration

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Transmission Service Business Practices on relatively aggressive timelines. We encourage BPA to consider whether a similar level of urgency can be applied to the Customer Build Option.

The proposed timelines should be viewed as outer boundaries rather than targets wherever earlier implementation is feasible.

Rapid Access Products & Interconnection Delivery (RAPID)

EWEB appreciates BPA's efforts through RAPID to address the gap between near-term customer demand and the longer-term timeframe required to plan and construct transmission infrastructure. Large loads, speed-to-power, co-location, and dispatchable load are increasingly relevant to EWEB's discussions with prospective customers, and we appreciate BPA's willingness to explore new approaches.

From EWEB's perspective, the current LLI process creates uncertainty in several important areas, including when studies are required, how long they will take, and how higher-queued projects with uncertain prospects should be reflected in planning. EWEB also sees potential for duplicative or speculative requests as prospective customers seek to evaluate multiple sites.

One potential opportunity is for BPA to provide high-level, indicative transmission information earlier in the customer development process. Information regarding available capacity, known constraints, and the potential magnitude of system improvements could help customers make more informed site-selection decisions before initiating formal interconnection studies.

This type of early information could reduce speculative requests, better focus BPA resources on more mature projects, and provide greater certainty to customers without replacing the formal interconnection process.

Conclusion

EWEB appreciates BPA's continued engagement with customers through GAT and believes the initiative is addressing important challenges facing the region. We encourage BPA to maintain the momentum of this effort and to pursue solutions that are proportional to the scale and urgency of the challenges.

In particular, EWEB encourages BPA to continue looking beyond incremental improvements and consider whether existing processes can be fundamentally simplified or redesigned. If GAT is intended to be transformational, the future-state process should be meaningfully different, not simply a faster version of the current process.

EWEB looks forward to continuing to work collaboratively with BPA as these concepts are developed and implemented.

Respectfully,

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