

Grid Access Transformation Workshops

(formerly Transmission Planning Reform)

July 9 and 10, 2025



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Webex Notes



- BPA is using a Webex webinar format for this meeting.
 - Webex attendees cannot mute/unmute themselves or enable their webcam.
- The all-chat feature is disabled. Attendees can only message panelists.
 - To participate, attendees must raise their hand (BPA will unmute you to enable your participation), or send a question to panelists in the chat.
- If you are Webex by phone only: press *3 to request to be unmuted.
- Moderators will continue to address raised hands in the order received.
 - Please continue to state your name and affiliation.

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Agenda*

Day 1: July 9

- Setting the stage
 - What We Heard
 - o BPA OATT History
 - Program Scope
 - Engagement Schedule

Day 2: July 10

- The Future State
 - Proactive Planning
 - Accelerate Expansion
 - o Interim Service
- Transition to Future State
 - NITS Forecasts
 - Readiness Criteria
 - Transition Plan for LTF TSR
 Queue
- Next Steps

Setting the Stage

- What we Heard
- BPA OATT History
- Program Scope
- Engagement Schedule

Grid Access Transformation Program

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Background: Queue Qv

BPA identifies transmission upgrades in response to customer needs in three general areas: 1) Generator Interconnection, 2) New Transmission Service (NITS and PTP) and 3) Line/Load Interconnection



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What We Heard: April 21 Workshop Customer

- General support for the Request to Service in less than 5 to 6 years Vision, being "disruptive," and program scope to achieve it
- Desire to get into the details of and collaborate on solutions as quickly as possible
- Need for reform principles
- Request for scan of industry best planning practices
- Need for independent Transition and Future State implementation timelines
- Request that BPA work with state regulators to address potential impact from reforms on Requests for Proposal requirements

BPA OATT History



- **Pre-1996:** Customers encouraged BPA to adopt an open access tariff.
- **1996:** BPA adopts an open access tariff in a 212 proceeding.

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- **2000:** BPA uses 212 to amend its tariff and bring it closer to FERC's pro forma tariff.
- **2004:** Power and Transmission enter into the first NT MOA.
- **2007:** After an informal public process, BPA files its tariff with FERC and receives partial approval.
- **2017:** BPA begins a public process to align further with the pro forma tariff and considers returning to the 212 process.
- **2019:** BPA and customers agree to a revised tariff and use of the 212 process for future changes.

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BPA Transmission Service Products

- BPA provides two types of Transmission Service under it's OATT:
 - Point-to-Point (PTP) Service
 - · Terms and conditions of PTP Service are located in Part II of the OATT
 - PTP Service allows the Customer to move power from a Point of Receipt to a Point of Delivery
 - Billed on reservation capacity
 - <u>Reference PTP Product Overview</u>
 - Network Integration Transmission Service (NITS)
 - Terms and conditions of NITS Service are located in Part III of the OATT
 - Available only for service to Network Load
 - Billed based on metered Network Load
 - Includes planning obligations
 - <u>Reference NT Product Overview</u>
- Customers have taken NITS or PTP Service based on their eligibility for the service and as appropriate for their needs. BPA has offered customers opportunities to change the service type.
- BPA may modify the terms and conditions for either NITS or PTP transmission service through a tariff proceeding following the requirements in Section 9 of BPA's OATT (a proceeding under Section 212(i)(2)(A) of the Federal Power Act).

Six-Point Solution Framewor



Activating the Solutions:

Critical Path to Processing

LTF TSR Queue

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- **NITS Forecasts** An accountable planning basis
- Readiness Criteria Study-ready FTSRs/TSRs
- LTF Queue Management A queue that can be studied

New Execution System

- Accelerate Expansion Restructures plan, design, build processes for regional urgency
- Forms the foundation for 5-6 year delivery timeline by 2030

Bridge to Future State

Interim Service - Earlier risk informed
 access

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• **Proactive Planning -** Moving ahead of customer requests

Engagement Roadmap Going Forward

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*Dates subject to change.

Deep Dive Workshops

- July 29 & 30
 - Business Practice pre-draft working session
 - Solutions Deep Dives
 - Interim Service
- September 10
 - Solutions Deep Dives
 - Interim Service
 - Accelerate Expansion
 - Proactive Planning

Note: Agendas subject to change based on stakeholder feedback



End of Day 1





Start of Day 2



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* If the meeting is ahead of schedule on Day 1, certain topics from Day 2 may be advanced to the Day 1 agenda

Overview of Proposed Solutions

- The Future State
- Transition to Future State

Six-Point Solution Framewor





The Future State

Long-term reforms to enable proactive, scenario-driven planning and execution within a 5-6 year delivery window





Future State

Proactive Planning



Proactive Planning: Object

- Equip BPA with the vision to meet the region's evolving needs.
- Shift BPA from a reactive expansion model, triggered by customer requests, to one that anticipates transmission needs to prepare the system ahead of time.
- Incorporate long-term horizon forecasts, broader regional data, and use of scenario-based modeling and analysis.

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Proactive Planning: P

- Request Driven \rightarrow Request Informed
- Goal: Run the Request Informed process on a 2-3 years cycle
- Key Expansion Drivers go beyond transmission service requests
- Integrate 20-year outlook and evaluation of complete NITS forecast
- Identify Projects of "Least Regret"
- Finish implementation of proactive planning process within 5 years, including extensive engagement with customers, constituents and sovereigns on:
 - Key expansion drivers
 - Scenario development
 - Transparent criteria for project selection

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Future State

Accelerate Expansion





- Accelerating energization of new facilities to support vision of 5-6 years from request to service
 - Re-design BPA's plan, design, build processes
 - Increase execution capacity
 - Enable capability by 2030

Accelerate Expansion Principles

- Preserve the safety and reliability of the transmission system.
- Meet all statutory, compliance and reliability obligations.
- Significantly decrease the plan, design, build project lifecycle.

Accelerate Expansion: Focus Areas

- The project execution program has three primary focus areas. The first two are:
 - Capacity: Resourcing strategies to increase capital execution capacity
 - Speed: Redesigning our plan, design, build processes to prioritize schedule
- These two focus areas work in tandem. Significant improvements to project timelines depend on both.
- The third area of focus is exploring a mechanism for customers to build BPA network assets.

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Interim Service



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Interim Service: Objective

- Interim service redefines how and when BPA provides access to transmission capacity. Rather than waiting for full energization, this solution enables the agency to offer structured, risk-managed service earlier, using existing tariff products like Conditional Firm (CF) or 6NN to bridge the gap between request for service and longterm firm service.
- This approach directly targets the bottlenecks caused by an all-ornothing model of transmission delivery. By linking service to viable builds, outage schedules, and operational capacity, not just completed infrastructure, BPA can accelerate awards of transmission, improve customer flexibility, and shift its posture from awaiting construction of facilities to immediate access of service.

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Interim Service: Principles

- Manageable congestion is acceptable and must address:
 - Sub-grid constraints for which there is no managed path or a managed path can't be implemented
 - Third party transmission provider impacts
 - 1:1 constraints with potential impacts on seams
 - Functionality of congestion management tools
- Existing transmission rights will be preserved
- BPA intends to preserve the quality of service for existing transmission rights holders

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Interim Service: Options for Transmission

NERC Priority Code	Pros	Cons
Priority 7	 NITs and PTP both are firm NITs and PTP both have Congestion Rent (CR) Would not require a tariff change to implement 	• If the new service was offered at level 7, it could result in more curtailments then have historically occurred which may impact all customers taking service at priority 7
Priority 6 (CF, 6NN)	 CF and 6NN are less than firm CF for PTP is eligible for CR Would not require a tariff change to implement 	 6NN is ineligible for CR. BPA has committed to engage with customer regarding the treatment of CR in the next rate case when we implement the market implementation Could degrade quality of service using priority 6
Potential other new products (could be lower priority)	 Treats both NITs and PTP equitably 	 Limited to a duration no longer than 365 days Would require a tariff change to implement

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Curtailments on Flow-Based Paths

Of the **18** <u>Flow-Based Paths</u> on the network, **four** of them have had curtailments in the past **five years**:

- Raver Paul
- North of Echo Lake

- South of Custer
- North of Pearl



Average of the MWs curtailed on these paths are approximately 0.5% of average of the MWs scheduled per day. Between 1/1/2020 and 3/1/2025 there were 20 days with curtailments, with an average of 4.4 hours per day.

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Curtailments on 1:1

From Jan. 1, 2020 to June 1, 2025 there have been curtailments on all <u>eleven 1:1 Network Paths</u>*.

Number of Hours Curtailed vs the Number of Hours

NOT Curtailed from 1/1/2020 to 6/1/2025



% of MWs curtailed by Priority Tag 1-5, Priority Tag 6, and Priority Tag 7



Average of the MWs curtailed on these paths are approximately 0.02% of average of the MWs scheduled per day. Between 1/1/2020 and 6/1/2025 there were 967 days with curtailments, with an average of 6 hours per day.

* Interties are not included

Pre-decisional. For Discussion Purposes Only

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Interim Service: What to Expect

- By providing interim service to qualifying requests, while they wait for firm service, congestion may increase.
- The increase in congestion may not be driven solely by the increase in interim service, some may be due to the increased flows in the markets.
- BPA proposes to explore limitations on Extensions for Commencement of Service rights for interim offers.
- TSRs with a newpoint request impacting NWACI facilities are ineligible for interim service.
- Possible market settlement impacts.

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Transition to Future State

Near-term actions to clear bottlenecks, restore queue integrity, and stabilize planning.





Transition to Future State

NITS Forecasts


NITS Forecasts: Objective

- Most forecasts will be accommodated and therefore not subject to the commercial planning process.
 - By placing forecasts at the center of BPA's planning approach, the agency is equipped to plan ahead of need, prioritize trended demand, and, where necessary, expand system capacity with discipline and fairness.
- The Network Integration Transmission Service (NITS) Forecasts initiative aligns BPA's planning approach with the growth of NITS Customers.
 - Applying additional planning scrutiny to transmission forecasts associated with new large loads ensures appropriate transmission access, planning treatment and cost allocation.
- This initiative aligns with the shift from reactive planning to proactive planning.

NITS Forecasts: Principl

• The transmission needs of NITS Customers experiencing trended load growth are differentiated from and balanced with NITS Customers experiencing large load growth.

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- NITS Customers have clarity what load growth will require Commercial Planning.
- Will not be retroactively applied to confirmed transmission or awarded encumbrances.
- Members of a Joint Operating Entity (JOE) are treated as individual NITS Customers.
- The determination of transmission needs associated with a New Large Load is made using a NITS Customer's submitted LaRC.

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NITS Forecasts: Staff Leaning

Annual New Large Load Threshold per POD

- Any 13 MW or more forecast increase during any year **per POD** * must participate in Commercial Planning.
 - Anytime a load forecast for POD increases 13 MWs or more during a 12-month period, the POD is designated as a New Large Load beginning in the year the increase was forecast.
 - The forecast increase for a New Large Load receives a Queue Time based on the receipt of the LaRC and is subject to Commercial Planning.
 - Any subsequent load forecast increase for a New Large Load is also considered New Large Load and is subject to Commercial Planning regardless of the amount of the increase.
 - A POD designated as a New Large Load will generally remain so for the life of the POD.
 - Interconnection requirements and sub-grid mitigations must be resolved.

*The Transmission Customer POD in the NITSA Exhibit A and forecasted in the OATT Load Information of the LaRC.

Previous NITS Planning <u>Threshold Alternatives</u>

1. New Large Load threshold per facility

Any 13 MW or more forecast increase during any year at a single facility must participate in Commercial Planning.

2. Annual MW threshold that varies by year

Any forecast increase for the total customer peak that exceeds a fixed annual MW threshold (varies by forecast year) must participate in Commercial Planning.

3. Larger of percentage or MW threshold

A forecast that exceeds the greater of 5 MW or 1.5% (annual basis) must participate in Commercial Planning.

Pre-decisional. For Discussion Purposes Only

NITS Planning Model

How NITS forecasts submitted via the LaRC are utilized across BPA's forecasting and planning processes



Pre-decisional. For Discussion Purposes Only



Additional NITS Issues

• BPA is reconsidering the 70% load forecast likelihood criteria that is used for Transmission Planning purposes.

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- We would like to discuss this issue at a future date.
- Transmission Access for Load Forecast Decreases Policy
 - This policy is recommended to be addressed at a later date.
- Unreserved Use Penalty
 - This policy, if recommended as part of the NITS Forecasts initiative, will need to be developed at a later date to coincide with a rate case.
- FY26 Annual LaRC Cycle
 - BPA is reconsidering the timing of the annual LaRC cycle held 8/30/25 through 9/30/25.
 - A change to the LaRC timing may affect when the typical June/July NOC meeting occurs.

Transition to Future State

Readiness Criteria



Readiness Criteria: Object

- Enables BPA to prioritize requests that reflect uses of the transmission system that will occur and align them with transmission system encumbrances and system need by establishing a consistent information protocol for entry to its long-term firm transmission queue.
- Readiness Criteria reforms how BPA determines which transmission service requests are eligible for submittal, ensuring time and resources are spent on mature, executable needs. It addresses one of the most persistent problems in the current system, immature requests, which create substantial encumbrances and consume substantial bandwidth but for which a significant portion will fail to convert to service.

Readiness Criteria: Principles

- Require customers to bring mature requests for long-term firm service to enter the queue
- Address issues associated with planning physical infrastructure for virtual paths and newpoint requests impacting NWACI facilities

BPA has historically allowed information uncertainty in the transmission request queue. However, it is no longer tenable to continue this practice, and the future state makes it unnecessary.

Readiness Criteria: Customer Comments

BPA received comments from NIPPC and RNW (combined):

- Most RFPs require transmission to support a bid regulator support would be needed for a change
- Need for a validation model that allows for other types of business models energy purchased from a range of suppliers to deliver to a range of loads (energy trading model)
- Need to ensure that model supports wholesale competition
- Address relationship between transmission and generation interconnection cluster study process
- Completion of GI study may spike requests for on demand service
- Explore whether transmission study can incorporate GI reform elements such as scalable plans, potential aggregation of resources and loads

BPA recognizes the importance of communicating with the state regulators and LSEs regarding this shift.

Readiness Criteria: Areas of Focus

Readiness criteria will substantially increase the threshold for what qualifies as a valid FTSR or TSR:

- For bilateral NITS transactions
- For bilateral PTP transactions (i.e., those with a defined party at the POR and POD) as applicable
- Northwest Hub and MIDCRemote multiple alternatives
 under consideration
- Criteria for loads and resources outside the BPA balancing authority

Readiness Criteria: Process Overview

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Readiness Criteria: Foundational Concepts

- Meets existing FTSR/TSR requirements specified POR, POD, Source, Sink, start, stop (duration), MW, receiving party (consistent with existing requirements).
- For any relevant generation or line/load interconnection, the electrical plan of service must be defined by the relevant transmission provider and construction contract for the project (if needed) signed and funded.
- Any sub-grid transmission constraints must have been addressed.
- TSRs with a POR or POD on the NWACI facilities are ineligible for interim service.
- BPA proposes to explore limitations on Extensions for Commencement of Service rights for interim offers.

Readiness Criteria: A NITS Note

For NITS transmission planning:

- 100% of the forecasted load submitted via the LaRC will be utilized, regardless of probability, as part of one or more scenarios in the proactive planning studies
- Nevertheless, FTSR submittal requires a mature forecast. There is readiness criteria for encumbering transmission for a specific NITS use for above the line forecasted transmission needs

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Readiness Criteria for FTSRs and TSRs

- Mature line and load interconnection/generator interconnection plans of service with any necessary agreements to initiate the project signed/funded
- Acceptable evidence of readiness for bilateral requests:
 - Power Purchase Agreement
 - Notice of award from Request for Proposal*
 - Letter of intent signed by both parties*
 - Other formal indications that the transaction will be used to serve load that exists or will exist during the period of the contract?

* (Transmission offer possibly conditional on final execution)

BPA is interested in feedback on what other formal events or steps are used that represent commitment to a transaction prior to its actual execution.

Planning for Virtual Points: Problem Statement

- LTF Transmission Service Requests (NOT reservations or renewals of existing service) from the virtual long-term reservation points of Northwest Market Hub (NWHUB) and MIDCRemote create significant planning complexities.
- Any such endeavor creates multiple challenges that do not exist in planning for requests to other points. In this environment, BPA is pursuing options for modifications to treatment of NWHUB and MIDCRemote for requests for service.

Planning for Virtual Points Alternatives

No.	Alternative Description	NWHub	MidC Remote
Alt. 1	Remove NWHUB and MIDCRemote from the long-term market (would remain available in the short-term market). All such long-term requests would be invalid.	Removed	Removed
Alt. 2	Allow long-term firm transmission service requests involving NWHUB ONLY when both legs of the transaction are specified.	Allowed	Removed
Alt. 3	Allow NWHUB to continue to be requested in the long-term market and deactivate MIDCRemote as a requestable point in the LTF market (would remain available in the short-term market, but such requests would ONLY be eligible for reassessment CFS transmission).	Allowed	Removed
Alt. 4	Allow NWHUB and MIDCRemote to continue to be requested (without specification of another leg) – Does not address planning complexities/needs.	Status Quo	Status Quo
Alt. 5	Other approaches that would support planning of necessary infrastructure for long- term firm transmission?	TBD	TBD

Planning for Virtual Points Staff Leaning

• Staff leaning: Alternative 3

- Eliminate MIDCRemote as a requestable point in the long-term market (it would remain available in the short-term market). Longterm redirects to MIDCRemote would not be an option either, although long-term redirects away from MIDCRemote would still be allowed.
- Previously submitted transmission service requests (not reservations or renewals of existing service) involving MIDCRemote that are otherwise eligible to remain in the queue for long-term firm service would be conformed to NWHUB.
- In the future, new long-term Customer transactions that would otherwise have used MIDCRemote would be achieved through redirecting the long-term NWHUB POR/POD to Columbia Market point in the short-term market prior to scheduling.

Planning for Virtual Points: Staff Leaning (cont.)

• Staff leaning: Alternative 3 (cont.)

- CFS (or parallel NITS transmission) either system conditions for all current or future paths with above de minimis impacts or number of hours = 8,760.
- Contract start date for TSRs with a POR or POD of NWHUB must be within 90-180 days of the request (or start date in the past)
- BPA proposes to explore limitations on Extensions for Commencement of Service rights for interim offers.
- TSR does not remain in the queue for further service or long-term firm up.
 No ability to submit TSR for long-term firm up.
- Existing transmission service reservations are not impacted nor is rollover of existing reservations.
- If there is functionality of these points that would not be enabled by use of NWHUB with short-term redirects to Columbia Market prior to scheduling, please provide specific input and examples.

Readiness Criteria



- Additional Concepts:
 - If the cited generator is outside of the BPA BA, the Customer will still need to identify the generator which needs to electrically match the source POR and provide supporting evidence of transaction.
 - When the resource is outside of the BPA BA, the Customer must demonstrate transmission to an electrically relevant BPA POR.

Transmission arrangements into/out of the BPA BA need to be specified.



Please be as specific as possible for the following questions:

- Is there any additional evidence of two parties' intent to execute a specific transaction that BPA should explicitly add?
- Would functionality be lost by requiring MIDCRemote to be conformed to NWHUB and utilizing short-term redirects to Columbia Market? If so, please describe in detail.

Transition to Future State

Long-term Firm Queue Management



LTF Queue Management Context

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- BPA's transmission queue is no longer serving its intended purpose. What was meant to be a signal of future service demand has become a backlog of exploratory requests, many of which will never reach execution.
- The proposed solution initiates a disciplined transition: clearing inactive entries, prioritizing mature requests, and restoring credibility to the queue as a planning and capacity encumbrance tool.

The proposed approach reorients BPA's queue from a passive intake system to an actively managed pipeline.

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LTF Queue Management: Current Queue

74,559 MW

The total of studied and unstudied transmission requests currently in BPA's transmission queue.



LTF Queue Management Objectives

- Clean cut-off between transition state process and future state process.
- No unstudied TSRs in the queue.
- All TSRs remaining in the queue are under a post-study agreement.

LTF Queue Management: Principles

- Avoid requiring customers to resubmit TSRs under the new policies.
- New policies will be applied to the current queue.
- Use existing processes as much as possible.

LTF Queue Management: Customer Comment Excerpts

- NIPPC/RNW "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."
- Shell "encourages BPA to identify changes that it can *implement within the existing tariff structure* that will allow BPA to resume as many processes as possible as a transition process pending development and implementation of more comprehensive reforms on a durable basis."
- NRU "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."
- NewSun "Apply prior builds, study first [tranche(es)]"
- NRU "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."
- "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."

LTF Queue Management: Transition to Future State



Criteria will allow BPA to restart queue processing and study of mature requests.

Pre-decisional. For Discussion Purposes Only

LTF Queue Management: Recap of Necess Conditions

- New Large Load threshold and Readiness Criteria are implemented and applied to the existing queue.
- Sub-grid transmission plans of service may be identified through multiple planning processes.
- Develop Interim Service agreements:
 - Could be a "Less than Firm" agreement.
 - Agreements may include project fees, security requirements, stranded cost provisions, scoping and environmental costs, or any combination.
 - Additional areas of consideration:
 - Explore minimum required duration of service.
 - Explore limitations on Extensions for Commencement of Service rights.

Transition to Future State

Business Practice Scope & Schedule



Transition Plan: Business Practice Scope

Business Practices needing updates for processing the LTF TSR Queue:

- 1. NT Transmission Service
 - Add New Large Load treatment.
- 2. Line and Load Interconnection Procedures
 - Align with NT Transmission Service changes.
 - Other updates to align with current process.
- 3. Requesting Transmission Service
 - Provide clear list of readiness criteria.
- 4. TSR Study and Expansion Process (TSEP)
 - Adjust language throughout the TSEP BP to enable implementation of the transition process.
 - Add language to enable issuing different types of agreements at different points in the process.
- 5. Conditional Firm Service
 - Add Interim Service implementation details.
 - Address treatment of virtual long-term reservation points.
 - Note: this BP update may be on a later timeline.

Transition Plan: Business Practice Schedule*

- July 24 BPA posts "pre-draft" BPs for review
- July 29 & 30 Collaborative working session with customers on "pre-draft" BPs
- Aug. 13 Deadline for customer comments on "pre-draft" BPs
- Aug. 28 BPA initiates BP process; draft BPs posted
- Sept. 8 BP customer call (within 6 business days)
- Oct. 6 Deadline for comments on draft BPs
- Nov. 4 End of BP process; BPA posts responses to comments and updated BPs (effective Nov. 4)

*Business Practice process dates are tentative.



Next Steps





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Next Steps

- Upcoming Workshops
 - July 29 & 30 deep dive workshop
 - Sept. 10 deep dive workshop
- Comments can be submitted at:
 - techforum@bpa.gov
 - Subject line: Grid Access Transformation
 - Please cc your Transmission Account Executive or Constituent Account Executive
 - Comments due by July 21, 2025
 - All comments will be publicly posted