



August 22, 2025

Bonneville Power Administration

By e-mail to: techforum@bpa.gov

Re: Comments on BPA's Grid Access Transformation Transition

I. INTRODUCTION

The Northwest & Intermountain Power Producers Coalition ("NIPPC") and Renewable Northwest ("RNW") submit the following comments in response to topics raised at BPA's Grid Access Transformation ("GAT") workshop on July 9 and 10, 2025. These comments focus on the Future State described by BPA in those workshops.

NIPPC and RNW continue to agree with BPA that a fundamental shift in how BPA expands the transmission system is necessary to meet customer, constituent, and market needs while being responsive and aligned with BPA's obligations. NIPPC and RNW strongly support many of the reforms BPA has proposed. The primary area of concern is BPA's proposal to rely exclusively on evidence of a power purchase agreement or bilateral transaction between a load and resource as the sole mechanism to establish commercial readiness. As discussed in greater detail below and in earlier comments, NIPPC and RNW suggest that BPA should not require evidence of a bilateral agreement as the sole, primary, or preferred indicator of commercial readiness—just as we commented on the Transition state's initial proposed commercial readiness criteria.

As BPA and stakeholders begin the process of developing details to implement BPA's broad goal of more "proactive" transmission planning, NIPPC and RNW encourage BPA to take other processes into account. For example, the Western Transmission Expansion Coalition ("WesTEC") process and a FERC Order 1920-compliant NorthernGrid planning process will both incorporate scenario-based planning over longer time horizons; NIPPC and RNW encourage BPA to apply planning principles and lessons learned from those processes to these GAT reforms. Likewise, other regional programs such as the Western Resource Adequacy Program ("WRAP") and BPA's recent Generator Interconnection Queue reforms are likely to impact the timing of requests for transmission service. NIPPC and RNW

encourage BPA to coordinate these GAT reforms with the timelines and requirements of those other regional processes.

NIPPC and RNW appreciate BPA's decision to bifurcate the GAT process into parallel workstreams; one to focus on near term solutions and Transition issues so that BPA can resume processing transmission service requests; and another to focus on the further reforms needed to implement the Future state BPA envisions. NIPPC and RNW, however, encourage BPA to develop reforms to the Secondary Capacity Model ("SCM") and customer build options in parallel with the development of the Transition process. To the extent BPA can implement incremental reforms to the SCM and customer build options, it should do so.

II. BACKGROUND

In the view of NIPPC and RNW, until recently, the TSEP requirements and customers' contractual flexibility under the OATT were fairly adequate in balancing the needs of customers and BPA. While NIPPC and RNW also recognize the historical background that led to the existing TSEP requirements, BPA's circumstances and the regional demand for new generation and transmission have changed significantly enough that new processes and requirements are necessary to ensure that transmission service is available to those who need it. As BPA's transmission system has become more constrained, it has become increasingly clear that the low barriers to entering TSEP, the options that customers have to delay service, and customers' limited exposure in the event they renege on their contracts have all contributed to customers entering and lingering in the queue even when they have no immediate need for transmission service (but continue to encumber capacity that could be awarded to other customers who do have an immediate need for service). While customers' current strategies were a rational commercial response to utility procurement practices in the region in the past, as the region has evolved new solutions are required. NIPPC and RNW agree with BPA that drastic change in the transmission service queue process is necessary.

NIPPC and RNW also recognize the challenge that the sheer volume of requests in the 2025 TSEP cluster poses to BPA planners. Large numbers of immature or incomplete transmission service requests exacerbate the challenges to BPA. Accordingly, NIPPC and RNW support reform of BPA's transmission service request process towards a first-ready, first-served model like the reforms to BPA's Generator Interconnection queue adopted in TC-25. Accordingly, NIPPC and RNW support the adoption of reasonable readiness criteria as a condition to requesting transmission service.

III. AREAS OF BROAD SUPPORT

NIPPC and RNW agree with BPA on the following broad principles (this same agreement is reflected in our comments on the Transition state):

- “Disruptive” reforms to BPA’s transmission planning process are necessary;
- Scope of reforms should include Generator Interconnection, Transmission Service, and Line and Load Interconnections;
- Separate timelines for Transition and Future states;
- Accelerated timeline for Transition;
- Need to engage Commissions on reforms to state requirements for Requests for Proposal;
- Need for reasonable readiness criteria as a condition to request transmission service;
- Need to accelerate plan, design, and build phases of transmission expansion; and
- Reforms should not diminish the service of existing customers.

IV. PROACTIVE PLANNING

NIPPC and RNW appreciate BPA’s decision to reconsider its approach to planning, approving, and constructing transmission facilities needed to meet the Future needs of the region. NIPPC and RNW recognize that BPA’s vision for the Future state largely aligns with the vision that NIPPC and RNW expressed in our May 2023 White Paper entitled *‘Appropriate and Required’: BPA and Building the Grid the Northwest Needs*. Accordingly, NIPPC and RNW strongly support the end state that BPA has described in these workshops, including:

- Shifting BPA from a reactive expansion model based on customer requests;
- Moving to a proactive planning model that includes:
 - A longer planning horizon;
 - 20 year forecasts of load growth and generation resource development;
 - Use of scenario-based modeling;
 - Two to three year planning cycle;
 - Identifying “least regrets” transmission projects that meet needs over multiple potential Futures;
- Undertaking elements of planning, design, study, procurement, and construction in advance of need;
- Implementing this Future state within 5 years.

NIPPC and RNW commit to engaging with BPA and other stakeholders to develop the details necessary to implement these reforms.

As the region moves to develop the details regarding how BPA will undertake “proactive” transmission planning, NIPPC and RNW encourage BPA to incorporate elements from existing proactive planning processes. Through its participation in WestTEC, BPA staff is gaining experience with scenario-based transmission planning. NIPPC and RNW anticipate that BPA will implement many elements of the WestTEC process as part of these reforms.

Also, BPA is a member of NorthernGrid which is currently undertaking an effort to implement “proactive” planning in the region to comply with FERC Order 1920. While drafts of the NorthernGrid compliance plan are not yet public, NIPPC and RNW encourage BPA to consider and implement proactive planning consistent with Order 1920 as part of this reform process. NIPPC and RNW also encourage BPA to consider how its Attachment K planning and the NorthernGrid planning processes can mutually support each other with respect to timelines, planning assumptions, and scenario development. Ideally, the NorthernGrid and BPA planning processes will be consistent and coordinated. NIPPC and RNW anticipate that transmission expansions identified in the NorthernGrid planning process would be prime candidates to consider for early-stage development in advance of customer requests for transmission service. Accordingly, NIPPC encourages BPA to consider the results of NorthernGrid’s planning processes as one factor in determining which transmission expansions BPA will consider in selecting projects for early environmental and preliminary engineering studies.

NIPPC and RNW also encourage BPA to consider how other regional processes will likely impact transmission service requests. For example, stakeholders worked with BPA to develop and implement Generator Interconnection Queue reforms in TC-25, including phased cluster studies. NIPPC and RNW urge BPA to explore consider how to coordinate the timelines of the GAT reforms with the timelines of the Generator Interconnection cluster study process. Similarly, the Western Resource Adequacy Program (“WRAP”) has specific timelines and requirements; BPA should consider how the reforms under consideration here will facilitate (and not complicate) WRAP compliance. Ideally, the processes and timelines of these other regional processes will complement and support the processes and timelines of transmission service reforms under GAT.

V. ACCELERATE EXPANSION

NIPPC and RNW support BPA's objective to adopt reforms intended to reduce the time between the decision to build and energization of new facilities. Specifically, NIPPC and RNW support BPA's proposal to reduce the time from BPA's receipt of a request for transmission service to commencement of service to five or six years. BPA, however, has targeted implementation of these reforms by 2030. NIPPC and RNW, however, do not agree that BPA should wait until 2030 to implement changes that BPA can implement sooner. NIPPC and RNW urge BPA to move more aggressively and introduce incremental changes to its processes to speed project execution and reduce costs to customers. Some elements of BPA's reforms may require tariff revisions to implement and may require a formal tariff revision process; other reforms, however, can be implemented under the existing tariff structure. BPA should implement incremental changes aggressively and as soon as it has the capability to do so. BPA should not develop and stack reforms for a single cutover date in the distant future.

BPA has identified three primary focus areas, Capacity, Speed and Customer Build. While a focus on cost may be implicit, NIPPC and RNW encourage BPA to promote Cost Containment as an area of focus on par with Capacity and Speed. NIPPC and RNW look forward to working with BPA to identify and facilitate the implementation of changes to BPA's existing practices to enhance BPA's capacity to expand the grid and speed project, design, procurement, and execution, all while containing costs. NIPPC and RNW anticipate that these reforms will include changes to BPA's Secondary Capacity Model ("SCM") designed to allow transmission customers greater flexibility in contracting to perform design, procurement, and construction of transmission facilities for BPA ownership and operation. NIPPC and RNW also encourage BPA to explore mechanisms to allow customers to engage contractors to conduct environmental studies for BPA to consider in weighing environmental impacts of transmission facilities. Competition in the wholesale electricity market is a core value of both NIPPC and RNW. Accordingly, we believe that enhancing the opportunities for competition among contractors qualified to perform environmental studies, project design, procurement, and construction to BPA's standards will reduce the costs and timelines of transmission expansion. NIPPC and RNW agree that part of this approach should be an expanded and permissive mechanism to allow customers to build BPA network assets.

VI. INTERIM SERVICE

NIPPC and RNW look forward to learning more from BPA regarding BPA's proposal for Interim service. BPA indicates that instead of waiting for full energization of new plans of service to support requests for transmission service, upon receipt of a valid transmission service request, BPA will offer the customer "Interim" service which may be subject to significant curtailment until such time as transmission upgrades are complete – potentially as long as 5-6 years. In previous comments, NIPPC and RNW suggested that a willingness to execute an agreement for "as available" service would be a clear indication of a customer's commercial readiness. NIPPC and RNW caution BPA, however, that customers should not pay the full rate for Firm Point-to-Point service for a transmission product that is subject to significant curtailments. NIPPC and RNW encourage BPA to engage its transmission rates staff to develop, with customer input, the rate treatment for this new transmission product which combines a long term of service with frequent curtailment and that reflects the actual cost to BPA to provide the service. NIPPC and RNW anticipate that BPA's proposed Interim Service will also require changes to BPA's ancillary services rates to reflect the increased uncertainty associated with this new product. BPA has also indicated that it intends to join the Markets+ day ahead market. In developing rates for this new product for the Future state, BPA should expect customers to offer their generation to the market when their transmission service is – or is likely to be – curtailed. NIPPC and RNW encourage BPA to engage its Power and Transmission rate staff early in this process to ensure that the reforms stakeholders consider in GAT will not have unintended or surprising consequences in future rate proceedings.

VII. FUTURE STATE READINESS CRITERIA

NIPPC and RNW have previously submitted comments related to BPA's proposed readiness criteria in comments for the Transition phase. Those comments, including the concerns raised there regarding BPA's proposed readiness criteria for the Transition phase, are equally relevant to the readiness criteria proposed for the Future state. NIPPC and RNW comments on this topic can be summarized as follows:

- Evidence of a transaction between a generator and a load serving entity must not be the sole, primary, or preferred mechanism to establish commercial readiness;
- Restructuring RFP processes in the region will require a significant investment in time and resources from public utility commissions, BPA, investor-owned utilities, generation developers, and other stakeholders;
- Customers should be able to demonstrate commercial readiness through a financial commitment, including a commitment to take "Interim" service;

In comments on the Transition state, NIPPC and RNW suggested that reform of existing regulated utility Request for Proposal (“RFP”) requirements is not a tenable near-term approach. NIPPC and RNW, however, support exploring RFP reform as part of deeper regional transmission reforms, well beyond BPA, that are typically associated with the formation of a regional transmission organization or an entity offering analogous services (i.e., consolidation of transmission tariffs, transmission operations, regional planning, and cost allocation, and a general shift away from contract-path transmission rights to financial transmission rights). Indeed, NIPPC and RNW view the changes proposed by BPA in the GAT Initiative through the lens of financial transmission rights and flow-based transmission management as the obvious alternative, and potential eventual end-state, of BPA’s transmission services, perhaps as part of an evolution beyond the treatment of transmission rights and congestion revenue in the organized day-ahead markets that will launch soon. NIPPC and RNW would welcome BPA’s perspective on how that eventuality—a more fundamental shift away from the physical contract-path rights paradigm—intersects with the Future state.

NIPPC and RNW believe that there is a possibility that the general approach that BPA has outlined in making commitments between generators and load-serving entities a main (not sole, primary, or preferred) mechanism to establish commercial readiness may work in limited circumstances. In that spirit, NIPPC and RNW encourage BPA to begin efforts to coordinate with state commissions on potential reforms to state RFP processes for the Future state. These changes, however, should be made only if the state regulatory commissions significantly modify their competitive procurement rules and policies. If BPA wishes to continue to pursue this option, then NIPPC and RNW will participate in the efforts to ensure that both utility procurement processes and BPA policies can work together. We note that a regional procurement model that places more emphasis on offtake agreements being signed prior to transmission being available would represent a significant new assumption of delivery risk by power suppliers and offtakers—this risk allocation would have to be carefully vetted by state regulators.

In comments on the Transition phase, NIPPC and RNW also discouraged BPA from tying readiness criteria in the Transition process to the results of utility procurement processes unless and until the state regulatory commissions adopt policies that allow the utilities to contract with IPPs without having secured transmission. We noted that such a policy shift by the commissions must be accompanied by a demonstrated willingness of the actual counterparties for such power—the utilities themselves—to accommodate this new paradigm. NIPPC and RNW caution BPA that any effort to reform utility procurement

practices and state commission policies related to procurement may not be successful; BPA and stakeholders should work to develop other alternatives in parallel.

Nevertheless, NIPPC and RNW agree with BPA that in the Future state customers should meet readiness criteria as a condition to submitting a transmission service request.

Elements of reasonable readiness criteria in the Future state could include the following:

- Reverse Open Season
- Commercial Readiness
 - Agreement between a load and generation resource;
 - Customer commitment to execute take-or-pay agreement for “Interim” service (with rate treatment for the service that reflects BPA’s actual cost of providing the service and customers’ increased risk of curtailment);
- Certainty regarding details of the request (particularly Point of Receipt and Point of Delivery);
- Reasonable at-risk deposits;
- Minimum terms of service;
- Reasonable security;
- Agreement to limit requests for Extension of Commencement of Service; and
- Appropriate progress in a generator interconnection process.

NIPPC and RNW do not here repeat all of our comments about readiness criteria from the workshops and comment period on the Transition state—including being open to alternative criteria beyond the ones BPA and we have outlined—but those same views, which have evolved over the brief course of the GAT Initiative, hold true here as well.

Finally, NIPPC and RNW seek to underscore a concern raised in prior comments regarding the impact of these reforms on wholesale competition. Any reforms associated with customer access to transmission must not provide any advantage to vertically integrated load-serving entities seeking to contract with themselves for utility-owned assets thereby negatively affecting wholesale competition. While this is a particular concern for the Transition process, it will continue to be a concern for NIPPC and RNW as we work with BPA to develop the Future state. NIPPC and RNW would strongly discourage any transmission provider, including BPA, from creating a mechanism that would suppress supply-side competition, either intentionally or inadvertently.

VIII. CONCLUSION

Thank you for the opportunity to submit these comments. NIPPC and RNW appreciate BPA's continued engagement with stakeholders and look forward to collaborating further on this important initiative.