

Bonneville Power Administration  
P.O. Box 3621  
Portland, OR 97208-3621

April 30, 2026

*Transmitted by electronic mail to [techforum@bpa.gov](mailto:techforum@bpa.gov)*

RE: Comments on April 15, 2026, Grid Access Transformation Future State Workshop

The organizations signed on to this letter appreciate the opportunity to provide feedback on the April 15, 2026, Grid Access Transformation (GAT) Future State Workshop. We commend BPA for the progress made in developing the Proactive Planning and Accelerate Expansion tracks, which represent a significant shift toward a forward-looking, high-capacity transmission system.

As BPA moves from the TC-27 proceeding into these "Future State" engagements, we strongly encourage the agency to voluntarily align its processes with the fundamental principles of FERC Order No. 1920. While BPA is not a jurisdictional public utility for purposes of the order, alignment with these national standards will provide the Northwest with greater efficiency, predictability, and electricity reliability. Furthermore, because Northwest investor-owned utilities are required to comply with Order No. 1920, a unified regional planning process that includes BPA is the most effective path to a modernized grid.

Consistent with the [previous recommendations of NGOs](#), we urge BPA to align its new planning framework with the following Order 1920 principles:

### **20-year transmission planning**

We applaud BPA's decision to implement a 20-year scenario-based framework as part of its Expansion Planning track. To maximize the value of this long-range planning, BPA should ensure its scenarios are diverse and "reasonably plausible," explicitly incorporating extreme weather sensitivities. Order No. 1920 requires assessing grid resilience against climate-induced events. BPA should also commit to a repeatable planning cycle occurring at least every five years, independent of individual service requests.

### **"Seven Factors" for Planning**

BPA's proposed methodology involving Long-Term Capacity Expansion (LTCE) and Production Cost Modeling (PCM) should explicitly incorporate the seven categories of factors in Order No. 1920. These factors, including federal, state, tribal, and local laws affecting resource mix and demand, are essential for creating an accurate baseline for regional needs. We recommend that BPA deviate from a purely "reliability-driven" focus and instead use these factors to identify the High Opportunity Transmission (HOT) projects that solve multiple interconnected needs.

### **"Seven Benefits" for Project Selection**

Order No. 1920 requires potential transmission solutions to be evaluated against seven benefit categories, ranging from production cost savings and reduced congestion to the mitigation of extreme weather. BPA's new Expansion Planning process should adopt these metrics to ensure that selected project portfolios maximize benefits for Northwest ratepayers. This is particularly relevant as studies like WestTEC identify portfolios capable of reducing regional production costs.

### **Alternative Transmission Technologies (ATTs)**

While the Accelerate Expansion track aims to decrease the project lifecycle to 5 to 6 years, BPA should also maximize the use of Alternative Transmission Technologies (ATTs) at the planning stage.

Technologies such as advanced conductors, dynamic line ratings, and power flow controllers are often faster and more cost-effective than building new lines. BPA should establish a transparent process for explaining why these technologies are or are not selected for each identified transmission need.

### **Transparency**

BPA's commitment to "meaningful stakeholder engagement" in its new planning cycle is a positive step. To fully align with Order No. 1920, BPA should ensure that local transmission projects are reviewed in at least three public meetings to assess assumptions, needs, and potential solutions. Furthermore, all planning materials should be presented in plain language to facilitate engagement from the broader public and local governments.

The magnitude of the ongoing transformation in electricity supply and demand is unprecedented. By voluntarily aligning its GAT Future State programs with the principles of Order No. 1920, BPA can ensure its transmission system remains the bedrock of a reliable and affordable clean energy future for the Northwest. We look forward to continued collaboration.

Thank you for your consideration.

Kelsie Gomanie  
Western Markets Advocate  
Natural Resources Defense Council  
[kgomanie@nrdc.org](mailto:kgomanie@nrdc.org)

Fred Heutte  
Senior Policy Associate  
NW Energy Coalition  
[fred@nwenergy.org](mailto:fred@nwenergy.org)

Cullen Howe  
Senior Advocate  
Sustainable FERC Project  
[chowe@nrdc.org](mailto:chowe@nrdc.org)