

September 9, 2026

Submitted via techforum@bpa.gov

Re: Northwest Requirements Utilities Comments on BPA's Grid Access Transformation Future State

Northwest Requirements Utilities ("NRU") appreciates the opportunity to provide these comments in response to BPA's August 19th workshop ("Workshop") on its Grid Access Transformation ("GAT") initiative. NRU represents the interests of approximately 60 Load-Following preference customers and one generation and transmission cooperative, all of whom depend on Network Integration Transmission Service ("NITS") contracts with BPA for reliable load service. As a result, NRU and its members have a vested interest in the underlying methodologies that BPA uses to plan and expand its transmission system in response to transmission customer needs.

Below, we offer specific feedback on certain GAT topics as presented by BPA at the Workshop.

Planning Process and Definitions

We want to thank Bonneville for devoting the beginning of its workshop to describing the elements of and relationships between a number of its transmission planning processes. Such baseline education promotes a common grounding among stakeholders of the concepts, organizations, and functions that BPA relies on to complete its transmission planning activities. Although likely intuitive for BPA staff, external stakeholders routinely undergo staff turnover or otherwise are unable to memorize the various transmission planning efforts, of which BPA manages many. This causes confusion over which BPA transmission planning process governs what scope, includes what assumptions or inputs, or produces what deliverable. We suggest BPA routinizing this type of content and presenting it periodically, such as at its annual kickoff Attachment K planning meeting, especially as its transmission processes evolve over time.

As it relates to the overview material and assumptions that form the basis for BPA's transmission planning processes, we specifically highlight ongoing concerns with BPA's reliance only on load forecasts that are included in BPA's Agency Load Forecast for many of its transmission planning studies. As noted in the matrix on slide 6 of BPA's presentation, BPA includes only those loads that are accepted in the Agency Load Forecast for purposes of its System Assessment study, Generator Interconnection studies, and its Commercial Planning studies. The upcoming CFS Transition Study appears to include no consideration of any load forecasts whatsoever.

As has been well established, BPA's Agency Load Forecast only include load forecasts with probabilities greater than 70% to occur. We must highlight that BPA's tariff imposes a general obligation on Bonneville to endeavor to construct and place into service sufficient transfer capability to deliver NITS Customers' Network Resources to serve their Network Load. This obligation is in no way limited only to load forecasts that exceed 70% certainty. Moreover, BPA's current practice appears to result in the complete omission of any loads that are more likely than not to occur (i.e., greater than 50%), but that have not yet reached the arbitrary 70% certainty threshold. While NRU certainly opposes automatic and unbounded transmission expansion in response to each and every load forecast, we believe that foreclosing loads that are more probable than not to occur from BPA's transmission planning processes fails to satisfy a core tariff obligation to its NITS Customers. We therefore request further clarification on how BPA will plan for load growth in its Proactive Planning initiative, with specific focus on Non-Trended Load Growth assumptions between the Expansion Planning and Commercial Planning paradigms.

Expansion and Commercial Transmission Planning

We appreciate the update on BPA's execution of the Expansion Planning component of the Proactive Planning initiative. We believe that long-term, scenario-based planning is a preeminent tool to ensure that Bonneville will be able to satisfy its customers' transmission needs on a proactive and cost-effective basis. We look forward to more detail at the next Proactive Planning workshop, with specific focus on how NITS Customers' load forecasts will be used in such Expansion Studies, and how those assumptions will translate to the Commercial Planning phase. Similarly, Bonneville must clarify how capacity resulting from transmission projects identified by Proactive Planning will be allocated to customers through the Commercial Planning process.

Related to Commercial Planning, we appreciate BPA requesting feedback at such an early stage of development and recommend that BPA review information provided from customers over last summer's Transmission Planning Reform and Grid Access Transformation workshops. Customers and stakeholders offered considerable feedback on similar themes of risk tolerance, BPA's queue processing as well as its fundamental business model, which would likely prove useful today. Our feedback on the opportunities related to Commercial Planning follows.

Queue Position and LSE Minimum Bid Requirements

We agree with and support an approach that prioritizes readiness over queue position, generally. Queue time must be de-emphasized given today's transmission scarcity. BPA has already begun taking strides through the TC-27 process to ensure its transmission queue contains only mature and more viable requests for transmission service. This on its own should have a winnowing effect on the number of requests that are able to enter BPA's transmission queue.

Beyond these resource or load maturity requirements, we seek clarity on the additional factors BPA may consider in allocating scarce transmission capacity. BPA could consider techniques to prioritize

delivered value ahead of queue order, such as allowing Load Serving Entities (LSEs) or their relevant regulatory bodies inform the resource locations or service requests that are of highest value in terms of satisfying integrated resource planning requirements or regional resource adequacy needs. Often in response to utility Request for Proposals (RFP) processes, BPA's queue will become flooded with excessive and redundant service requests, all competing for limited RFP selections.

BPA's future state design must therefore allow it to constrain the queued demand in an economically rational fashion. There are similarities between this type of concept with an approach used by the CAISO, where LSEs help score generating project selections in the interconnection process. Additionally, the CAISO relies on forward-looking resource portfolios developed by the California Public Utilities Commission, including resource locations and zones, which informs the CAISO's resource assumptions. As we describe further below, the region will be significantly worse off were BPA to plan and build infrastructure based on artificial transmission needs as solely represented by the magnitude and volume of its queue; Bonneville's process therefore should constrain the transmission needs identified through its planning processes by the forecasted load growth of its customers.

Disconnected Queue Processes

NRU greatly appreciates BPA's consideration and inclusion of this topic. We recognize that integrated and holistic planning between and among BPA's various service queues represents a significant and complex challenge. However, managing and processing three separate, discrete, siloed transmission and interconnection queues presents considerable challenges of its own. Taken together, we support Bonneville assessing ways that it can plan on a more comprehensive basis that looks beyond individual queues. Such an approach could produce greater opportunities to identify right-sized transmission upgrades due to evaluating interconnection needs and transmission service needs on a more integrated basis. Similarly, such a process could provide interconnection and transmission network upgrade information to customers on a common timeframe, instead of staggered across years through separate study processes. These are important benefits that should be evaluated as part of BPA's analysis.

Financial Risk Standards

NRU generally supports aligning the customer financial requirements to the specific risks that BPA seeks to mitigate. We support measures that would mitigate the risk of cost shifts or underfunded transmission expansion projects. Further, we suggest Bonneville evaluate the totality of all of its customer requirements to ensure the combination strikes an appropriate balance between customer obligations and risk protection. On the one hand, imposing strict evaluation criteria and interconnection progress requirements to enter BPA's transmission queue, plus any other readiness criteria established through the Future State development, may provide considerable assurance that the requesting customer is mature and committed to taking its requested service. These factors could inform the level of financial commitment BPA may additionally require. On the other hand, low or weak requirements to enter BPA's queue or participate in expansion processes should absolutely carry a significant financial requirement.

BPA should also evaluate differentiating its financial requirements among the types of transmission solutions BPA identifies. Transmission solutions consistently identified across many or all long-term scenarios (least-regrets projects or “High Opportunity Transmission” projects) likely carry a different risk profile than projects identified only in a single scenario, that are primarily driven by a small number of service requests, or that are surplusage to addressing the long-term load growth needs of BPA’s transmission customers. In the end, we support Bonneville taking steps to protect against insufficient revenues or cost shifts caused by parties that appear interested in taking service but ultimately decline. We look forward to future discussions on this topic.

Business Model

Generally speaking, NRU agrees that BPA must carefully consider the model under which it plans and constructs new transmission infrastructure. For context, BPA’s transmission customers recently assumed an approximate 20% rate increase; there are over \$6 billion of Grid Expansion and Reinforcement Portfolio (“GERP”) costs that will begin to be recovered over the next 10 years; and BPA’s updated Risk Mitigation and Financial Plan refresh initiative strongly suggests potential additional rate increases to address liquidity risks or leverage concerns. Given these anticipated cost pressures and the ongoing affordability concerns across the industry, BPA must scrutinize every investment dollar and take every measure to avoid undertaking unnecessary capital additions.

To execute on this, we recommend BPA optimize how it conducts transmission planning on behalf of its customers. In our view this means planning first and foremost to address the long-term load growth forecasts of its load serving entity customers. Load growth and forecast demand generally drives new resource development, which in turn drives new transmission requests. Whereas historically Bonneville has identified transmission solutions sized to accommodate all of the requests in its queue, we suggest a potential departure. BPA should primarily leverage its engineering expertise and long-term demand drivers (including utility RFPs and integrated resource plans) to identify transmission solutions first, with subscription from its queue to follow.

For transmission reinforcements beyond those required to satisfy these baseline load-driven needs, we suggest Bonneville consider either offering to complete such projects through an incremental rate or participant funding type approach, or instead offer Conditional Firm Service exclusively. We also suggest BPA review previously submitted material on potential modifications to BPA’s transmission expansion model, such as the white paper submitted by NIPPC and Renewable Northwest as example, for additional concepts.

Lastly, we urge Bonneville to discuss with the region the benefits that it intends to rely on in evaluating transmission projects resulting from Proactive Planning. These projects are likely to have significant impacts on transmission rates, and it is imperative that BPA include feedback from its customers and stakeholders on the decision criteria for rate treatment determinations.

Accelerate Expansion

NRU remains strongly supportive of BPA's efforts to accelerate the execution of its transmission expansion program, and we appreciate these periodic progress updates on the Accelerate Expansion initiative. With respect to the Workshop, we encourage BPA to share metrics around its TIDES effort, including the increase in number of certified third parties that are contracted to bid on BPA projects, as well as the change in delivery timelines brought by these additional engineering resources.

Additionally, we support the presented scope of the Customer Build Option. Bonneville's proposal for implementing the policies and Business Practice to enable the Customer Build Option by the end of FY27 appears reasonable, but we encourage Bonneville to use best efforts to accelerate this policy as much as practicable in light of the tremendous transmission scarcity facing the region as well as BPA's own internal resource constraints.

Rapid Access Products & Interconnection Delivery (RAPID)

NRU appreciates the concepts described on the RAPID initiative and is encouraged that Bonneville appears to be prioritizing an accelerated interconnection process and access to new services through RAPID. Although high-level, the objectives appear to be well intentioned, in that speed to power for specific large loads must balance carefully against cost causation to prevent cost shifts to legacy users. Below we offer general comments on the presentation materials for BPA's consideration and look forward to future details on RAPID.

Line & Load Interconnection Process Reform

Our prior comments in response to BPA's proposed Line and Load Interconnection Procedures business practice raised concerns with the timelines to complete interconnection studies, which under the status quo can take over two years. We continue to believe that, though this status quo timeline may be acceptable for loads that are forecast to arrive well into the future, this timeline is insufficient for many of the specific large loads seeking immediate interconnection today.

We support efforts to benchmark across other transmission providers and urge Bonneville to evaluate and adopt such best practices in reducing study timelines. We particularly highlight the use of advanced computing and AI tools designed around grid analysis that can (in certain cases) result in considerable reductions in study timelines. In particular, we point to MISO's use of the SUGAR software which allowed it to automate its model building as well as selection and validation of network upgrades, significantly reducing the time to complete certain studies.¹ Similarly, SPP's partnership with Hitachi and reliance on its energy modeling software is expected to reduce interconnection study timelines by up to 80%.² Our comments are not intended to suggest BPA could adopt these applications on a direct one-for-one basis or that the use cases are completely identical; but, careful evaluation of analytical tools with proven applicability to interconnection studies could potentially help reduce a significantly long study process, or potentially allow BPA staff to conduct more studies in parallel.

¹ [MISO FERC Tech Conference - Speeding Up Interconnection Studies with Software Automation.pdf](#)

² [SPP Partners with Hitachi to Develop AI Solution for Transmission Reliability, Flexibility Challenges | American Public Power Association](#)

A second consideration centers on clustering the interconnection studies into a single package. Rather than sequentially issuing a System Impact Study Agreement, conducting the study, drafting and issuing a study report, followed by the same process repeated for a Facilities Study, Bonneville could instead offer to package these into a single study, as it has done for its generator interconnection and transmission services. For committed large load entities, the value in reducing the study process by even a few months can significantly outweigh the costs associated with a single, combined set of studies.

Co-Location and Behind-the-Meter

We are generally supportive of interconnection policies that encourage or facilitate co-location and behind-the-meter (BTM) approaches. Where a customer can develop on-site or BTM resources to serve all or a portion of a large load, Bonneville's tariff and rate structure should not serve as a penalty or disincentive. Locating resources close to loads can reduce the impacts to BPA's transmission system, avoid or reduce costly network upgrades, leave spare transmission capacity for other users, and otherwise allow large loads to interconnect more quickly. This approach can result in a significant win-win for BPA, its large load customers, and existing ratepayers. Moreover, this approach could help ensure that the region can satisfy resource adequacy needs on a more timely basis. However, we counterbalance this broad, generalized support with the notion that BPA must deliberately assess the impacts of these arrangements in advance to ensure that system reliability will not be compromised and that BTM resources or co-location arrangements do not lean on the broader grid without appropriate consideration, mitigation, or compensation.

To this end, we recommend BPA consider developing a specific interconnection study path for these types of circumstances, as well as potential contractual mechanisms to shield other transmission customers from the potential risks that may be caused by entering into these types of arrangements. We also recommend, as it relates to any "fast track" interconnection concepts, that Bonneville clarify how it will approach studying interconnection needs relative to the queue order in which requests were submitted. Will BPA prioritize studying certain interconnection requests ahead of others, irrespective of queue time, or instead will Bonneville process and study interconnection requests in the order in which they were received?

Dispatchable/Interruptible Load

In a similar theme as the co-location and BTM scenarios, we support policies that facilitate or encourage dispatchable loads. The ability for large loads to either curtail use or dispatch around congestion events can not only result in a more reliable grid, but it can also defer the need for significant network upgrades. Additionally, allowing the interconnection of new loads with no or minimal network upgrades can have a meaningful rate dampening effect, either on a sustained basis or during the period where network upgrades are completed. We view this as a critical benefit given the Agency's updated Risk Mitigation and Financial Plan Refresh initiative, which as noted above suggests that BPA is considering additional rate adders to mitigate liquidity concerns as well as potential

increased revenue financing in its transmission capital program, each of which would cause near-term upward rate pressure.

Grid Expansion and Reinforcement Portfolio Update and GIS Mapping Tool

NRU appreciates the comprehensive update on BPA's GERP projects. These projects represent critical upgrades to BPA's transmission system and the largest portfolio of capital transmission expenditures in decades. Many of these projects will provide the necessary transmission capacity to ensure long-term, reliable load service to many of NRU's member utilities. We recommend that BPA provide updates on the GERP projects, as well as other significant non-GERP transmission infrastructure development, on a semi-annual basis. Additionally, we request that Bonneville commit to conducting public engagement in advance of future rate decisions for the GERP 2.0 projects, which according to BPA staff will occur following scoping and environmental review.

Lastly, we commend BPA staff for developing and demoing its GIS-based mapping tool, which overlays a number of useful transmission layers on a map of BPA's service territory. This will no doubt prove a valuable and useful tool for external stakeholders to develop a more thorough understanding not only of BPA's GERP projects, but the many other attributes and information within BPA's transmission planning landscape.

Conclusion

We appreciate BPA's half-day Workshop to discuss various elements of its GAT effort, but note that it appeared much too short given the number of topics. At BPA's next workshop to discuss GAT we urge BPA to allot considerably more time to discussing the material given the program's wide scope. Moreover, we recommend BPA accelerate the development of details on the Commercial Expansion element in particular and aim to hold the next customer meeting on this topic by the end of October. This is the least defined, but arguably the most important, aspect of how BPA's transmission customers will secure additional transmission capacity in the future. If BPA determines additional tariff modifications are required, then it must initiate this work in the very near-term and on a timeline to conclude by the end of the TC-27 transition process. We look forward to engaging on these topics in the coming months. Please feel free to reach out if you have questions about any of these comments.

Sincerely,

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Northwest Requirements Utilities