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Comments on BPA's August 19, 2026 Grid Access Transformation Future State Workshop

Portland General Electric ("PGE") appreciates the opportunity to provide comments on BPA's Grid Access Transformation ("GAT") Future State initiative and thanks BPA for extending the comment period. PGE remains supportive of BPA's objectives to modernize commercial transmission planning, accelerate access to the Federal Columbia River Transmission System, and develop a more proactive approach to transmission expansion.

The need for this work is increasingly urgent. Across the region, load growth, resource adequacy requirements, generator interconnection, resource procurement, and state clean-energy policies are increasing demand for transmission while available long-term firm transmission capability is increasingly constrained. BPA's GAT initiative therefore has the potential to be more than a redesign of individual planning processes—it can provide a framework for moving from a largely request-driven model toward a coordinated system that anticipates regional needs, identifies expansion earlier, and enables customers that are ready to take service to do so more quickly.

PGE encourages BPA to move from future-state concepts to an executable implementation roadmap. The region has spent considerable time discussing many of the principles underlying GAT and we need BPA to translate those principles into decisions, studies, transmission expansion, and ultimately commercial service.

PGE's comments focus on the following priorities which we view as aligned with BPA's GAT objectives:

- establishing clear integration among BPA's planning processes;
- ensuring proactive planning captures credible future customer and regional needs;



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- establishing an implementation timeline with measurable milestones and near-term improvements;
- accelerating transmission access for customers and projects capable of taking service; and
- providing greater transparency regarding expansion decisions, schedules, costs, and funding.

1. Planning Process and Definitions - Establish an Integrated Planning Lifecycle

For customers making resource, transmission, and load-service decisions, the critical question is not simply what each study does independently, but how the studies collectively move a transmission need from identification to commercial service.

PGE requests BPA provide an integrated planning lifecycle at the autumn GAT workshop showing:

- the sequence and cadence of each planning, expansion, and commercial study;
- the inputs and outputs associated with each study;
- how outputs from one process become inputs to another;
- the points at which customers provide information or make commercial commitments;
- the decision points for identifying and approving transmission expansion;
- the relationship between planning studies and the development of a Plan of Service ("POS"); and
- the expected timeline from identification of a need through commencement of transmission service.

An integrated lifecycle would allow customers to understand not only BPA's organizational framework, but the end-to-end pathway by which a customer need becomes an actionable transmission solution. That should ultimately be one of the principal measures of whether GAT succeeds.



2. Expansion Planning - Capture Credible Future Needs Before They Enter the Queue

PGE understands that BPA anticipates completing its first Proactive Planning Expansion Study in April 2028 and that development of the baseline assumptions is underway. PGE supports proactive planning, but its value will depend significantly on whether BPA can identify credible future transmission needs before those needs are fully represented in existing queues and forecasts.

PGE requests BPA explain at the autumn workshop:

- how load-serving entity (LSE) load and resource forecasts will be incorporated;
- how anticipated resource procurement and resource adequacy needs will be considered;
- what information customers may submit regarding future needs not yet represented by requests;
- how BPA will distinguish sufficiently credible future needs from speculative requests; and
- how BPA will update assumptions between planning cycles as customer needs evolve.

PGE also requests BPA describe how the WestTEC portfolio and projects identified through The Western Transmission Consortium ("TWTC"), as well as other significant regional or customer-sponsored transmission projects, will be incorporated into BPA's proactive planning.

The objective should be to avoid planning the Federal system in isolation from transmission investments that may materially change regional flows, transfer capability, resource access, or the need for BPA expansion.

3. Commercial Transmission Planning - Move from Conceptual Alignment to Implementation

PGE supports many of the principles presented in the "Commercial Transmission Planning" section of the August 19 workshop. These principles are generally



consistent with concepts BPA presented in July 2025 and that received significant regional discussion and support during the summer of 2025.

That history, however, underscores PGE's principal concern: the region now needs implementation, not another extended cycle of conceptual alignment.

The transmission queue pause and continued constraints on access to long-term firm transmission have significant commercial consequences. Resource procurement, large-load service, and reliability planning are proceeding on timelines that cannot simply wait for the ultimate GAT future state. If implementation of Proactive Planning requires additional tariff proceedings after the current process, there is a material risk that important components of the future state will not become operational until 2031 or later.

PGE encourages BPA to address this risk directly.

At the autumn workshop, BPA should provide a GAT implementation roadmap identifying:

- major implementation milestones and decision points;
- which components can be implemented under existing tariff authority;
- which components require additional tariff changes;
- the expected completion date of the first Commercial Planning Study;
- the expected cadence of subsequent Commercial Planning Studies;
- when customers should expect the first actionable Plans of Service under the new framework; and
- what interim measures BPA will use to improve transmission access before the full future state is implemented.

PGE particularly supports BPA's goals of End-to-End Capability, Timely POS, and Enabling Service. These should become measurable outcomes rather than solely design principles. BPA should consider establishing performance metrics that allow customers and BPA to assess whether GAT is actually reducing the time required to move from a transmission request or identified need to a defined POS and, ultimately, transmission service.

LSE Procurement Requirements With respect to potential minimum-bid requirements for LSE resource procurements, BPA should recognize that utility



procurement requirements frequently reflect state regulatory requirements and Commission-approved procurement frameworks. Individual LSEs therefore may have limited ability to modify procurement structures solely to conform to a BPA transmission planning process.

PGE supports Seattle City Light's comments on this issue and encourages BPA to design GAT around the practical regulatory and procurement requirements under which regional LSEs operate rather than assuming those requirements can readily be modified.

Cost Allocation and Service Quality PGE recognizes that accelerated and proactive transmission expansion requires careful consideration of cost causation and appropriate allocation of expansion costs. BPA should continue engaging the region on these questions.

At the same time, cost allocation should be considered together with the availability, timeliness, and quality of transmission service being provided. A framework that minimizes near-term cost exposure but cannot provide transmission when customers require it may impose substantially greater costs on the region through delayed generation, constrained resource options, reliability risks, or inability to serve load.

The appropriate objective is therefore not simply minimizing transmission expansion costs, but establishing a durable balance among cost causation, system benefits, commercial readiness, and timely access to transmission service.

4. Accelerate Expansion - Create Additional Paths to Build Needed Transmission

PGE appreciates BPA's progress on TIDES and supports efforts to expand the mechanisms available to accelerate transmission development.

PGE specifically encourages BPA to begin stakeholder engagement on the proposed Customer Build Option as soon as practicable, rather than delaying until Spring 2027. Customers that are willing and able to advance transmission infrastructure should have a clearly defined pathway to do so where customer-led development can accelerate service without compromising reliability, system planning, or BPA's operational requirements.



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The Customer Build Option should be developed as a substantive component of GAT's broader objective of enabling service—not as a process that becomes available only after conventional development pathways have already exhausted substantial time.

PGE encourages BPA to address early the eligibility criteria, engineering standards, ownership arrangements, cost responsibility, reimbursement or crediting mechanisms, permitting responsibilities, construction oversight, and ultimate transfer or operation of customer-built facilities.

5. RAPID - Use Interim Products to Address Near-Term Access Constraints

PGE supports RAPID's objectives of developing fast-track transmission products and services, applying appropriate cost causation, and looking beyond the traditional transmission service request model.

RAPID is particularly important because it provides an opportunity to produce near-term commercial improvements while the broader GAT future state is being developed. PGE encourages BPA to prioritize products that can unlock existing system capability, better utilize existing interconnections, and provide service to resources capable of operating flexibly within system constraints.

In response to BPA's specific questions, PGE encourages further development in several areas.

Line and Load Interconnection ("LLI") processes. BPA should focus on steps where sequential studies, uncertainty regarding required network upgrades, or lack of alignment between interconnection and transmission-service processes prevent customers from making timely commercial decisions. Greater coordination between interconnection, transmission service, and expansion planning could reduce the risk that a project advances through one process only to encounter an unresolved constraint in another.

Co-location and temporary/non-firm service. PGE supports evaluating temporary and non-firm service structures for co-located resources where those arrangements can accelerate operation without creating inappropriate reliability or cost-shift risks. These structures may be particularly useful where resources can respond



operationally to system constraints or where incremental facilities are not immediately required to support firm service.

Fast-track product design. PGE supports continued development of pathways for co-located, behind-the-meter, and dispatchable resources. BPA should prioritize products based on their ability to produce incremental system value and accelerate commercially viable projects rather than attempting to fit all projects into a single service construct.

PGE also encourages BPA to develop a clear “batteries as load” framework. Storage increasingly performs both generation and load functions, and the ability to charge from the grid can materially affect resource availability, resource adequacy value, renewable integration, and efficient utilization of transmission. A transparent framework addressing charging rights, transmission service requirements, operational limitations, and cost responsibility would provide significant commercial value as storage deployment increases across the region.

6. GERP - Connect Expansion Decisions to Need, Schedule, and Funding

PGE appreciates the GERP updates provided during the August 19 workshop, particularly BPA’s improved presentation of project status and expected timelines. This information is valuable to customers making long-term resource and transmission decisions.

PGE encourages BPA to build on this transparency in future workshops by clearly identifying schedule changes and the reasons for those changes. BPA should also use consistent project names across presentations and planning processes or maintain an “also known as” cross-reference where project names have changed.

For GERP 2.0, PGE requests that BPA provide the underlying business case for each proposed project, including the need being addressed, expected transmission capability created, estimated cost, principal beneficiaries, and relationship to other planned regional transmission investments. BPA should also provide a clear schedule for GERP 2.0 funding and construction decisions.

This is particularly important given the funding issues being discussed through BPA’s Financial Risk Mitigation workshops. The region needs to understand not only which



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transmission projects BPA believes should be built, but how and when those projects can be financed and authorized. A technically justified expansion portfolio that lacks a viable funding pathway will not resolve the transmission constraints facing BPA customers.

PGE also appreciates BPA making the GERP Interactive Map available. The map is an effective planning tool and could be made substantially more useful by incorporating significant projects not identified as GERP or WestTEC, including customer-driven projects identified through prior TSEP cycles which were not ultimately selected as GERP projects. Providing a more complete view of planned and potential regional expansion would help customers understand how individual projects interact and where future capability may emerge.

PGE notes that earlier workshop materials referenced M2W, but that material was subsequently removed and M2W was not addressed in the August 19 presentation. Given the potential importance of the project to regional transfer capability and future transmission planning, PGE requests that BPA provide an update on M2W at the next workshop.

In summary, PGE supports BPA's GAT objectives and believes the initiative can materially improve how the region plans, expands, and accesses the Federal transmission system. The most important next step is to translate the future-state framework into an implementation plan that customers can incorporate into real commercial and planning decisions being made now.

The autumn workshop should therefore answer three fundamental questions:

- What changes?
- When does it change?
- What near-term actions will BPA take while the future state is being implemented?

PGE encourages BPA to use the next workshop to provide an integrated planning lifecycle, an implementation roadmap with milestones and dates, a clear pathway for incorporating credible future customer needs, and specific near-term actions through RAPID, TIDES, the Customer Build Option, and other available mechanisms.



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Given the pace of load growth, resource procurement, and reliability needs across the Pacific Northwest, the measure of GAT's success should ultimately be straightforward: whether BPA can identify needed transmission prior to request-submission and provide customers with actionable paths to transmission service on timelines that support their resource and load-service obligations.

PGE appreciates BPA's continued engagement with the region and looks forward to working collaboratively to advance these objectives.

Respectfully,

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