

PGE's comments on BPA's Grid Access Transformation Process

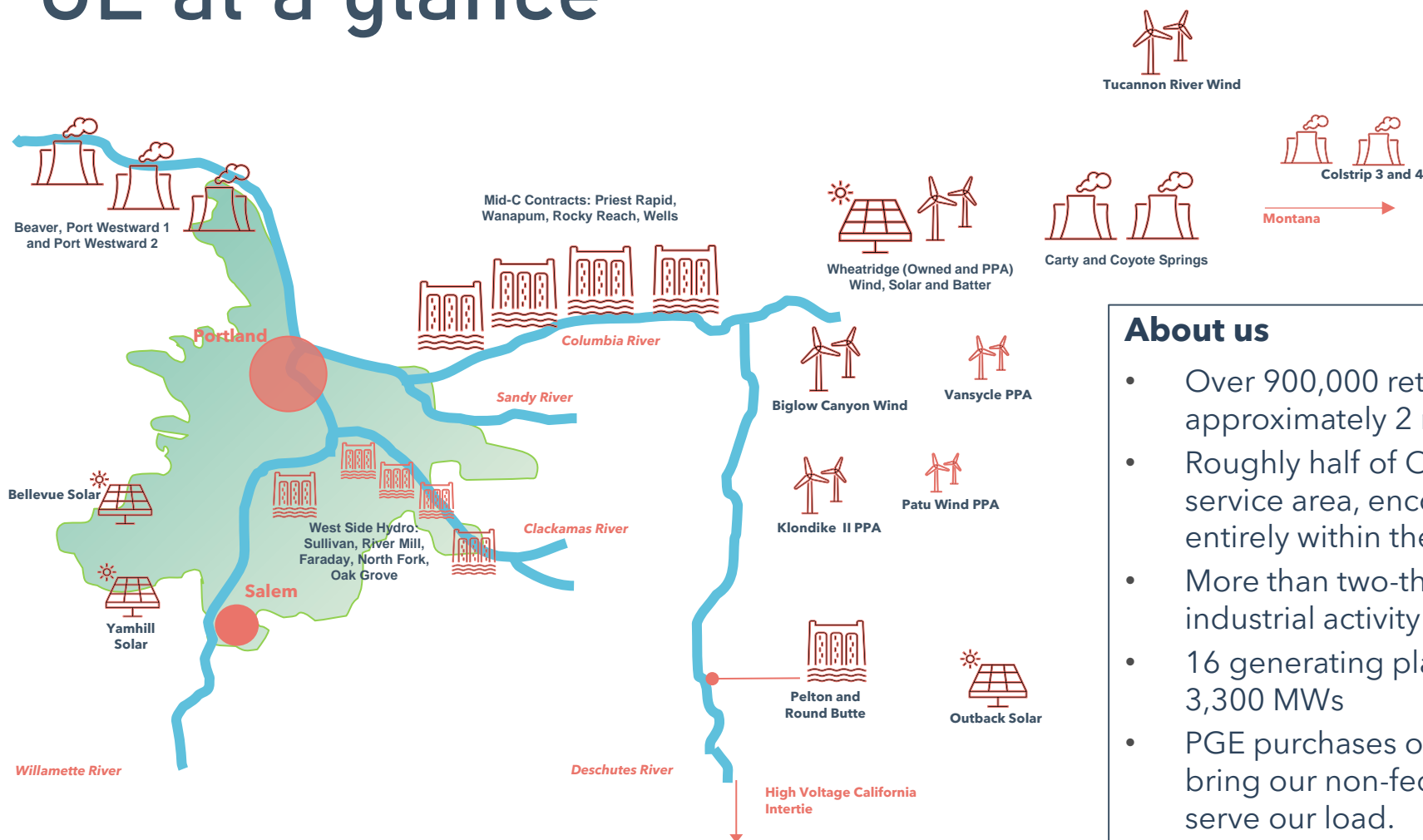
Laura Green, Senior Principal Strategy & Planning Analyst
Sept. 10, 2025



AGENDA

- About PGE
- PGE's Procurement Practices
- GAT Readiness Requirements
- BPA LTF Queue Management
- Interim Service
- Areas of Consistent Customer Alignment
- PGE's Proposed Next Steps
- Closing

PGE at a glance



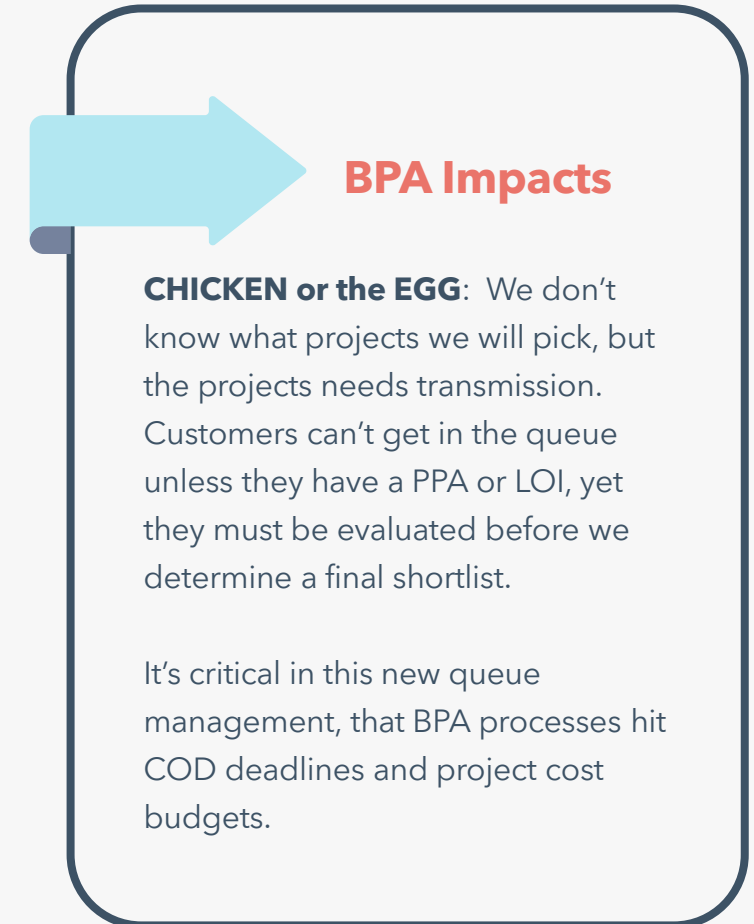
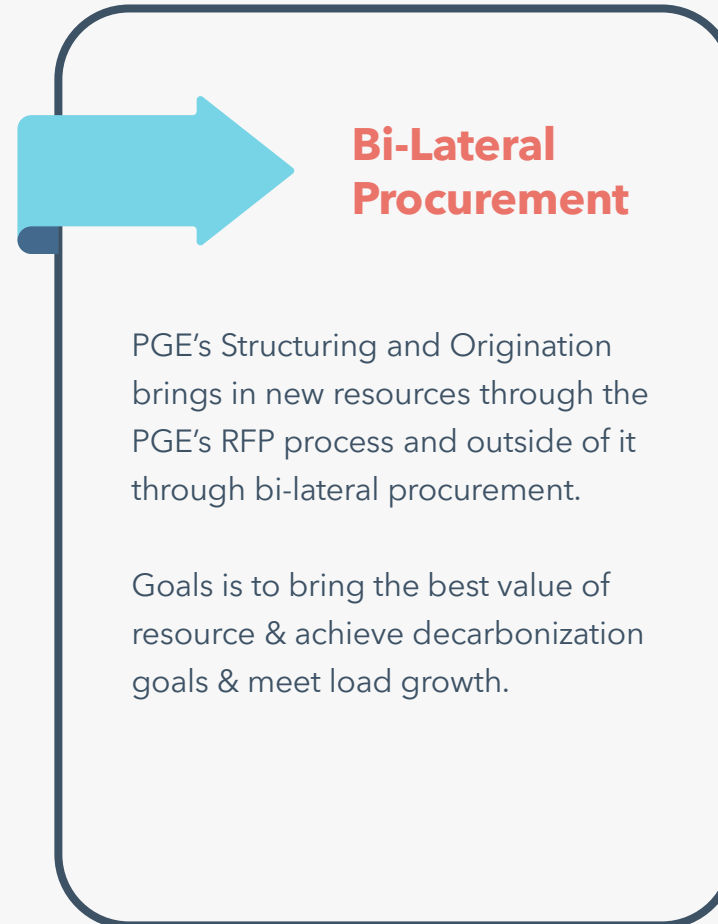
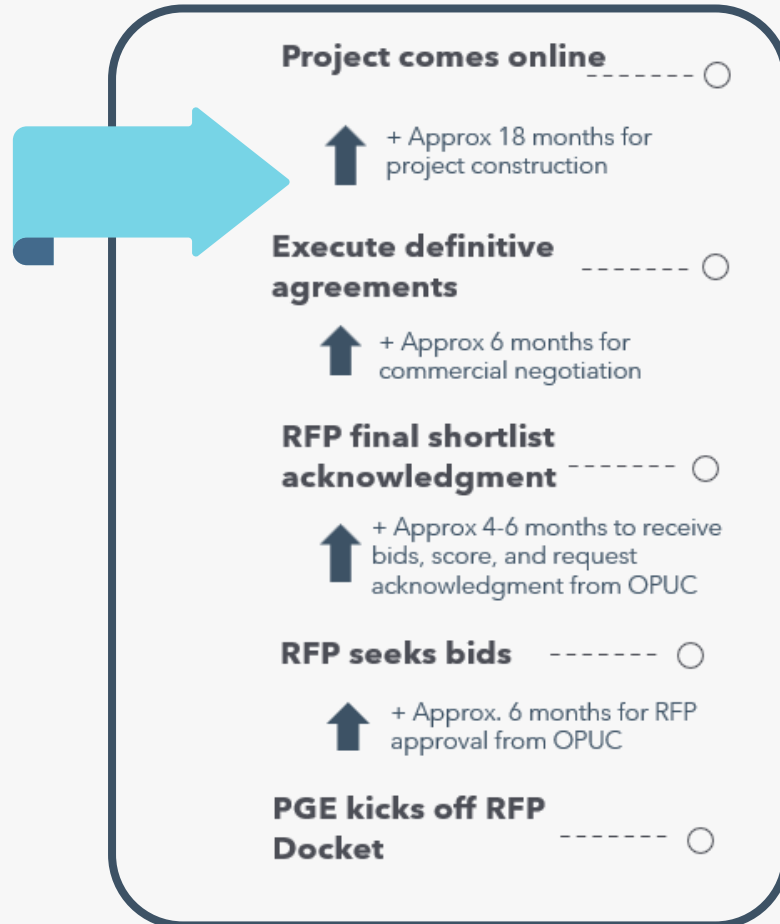
About us

- Over 900,000 retail customers within a service area of approximately 2 million residents
- Roughly half of Oregon's population lives within PGE service area, encompassing 51 incorporated cities entirely within the State of Oregon
- More than two-thirds of Oregon's commercial and industrial activity occurs in PGE service area
- 16 generating plants, 14 of which are in Oregon; 3,300 MWs
- PGE purchases over 4,300 MWs of Transmission to bring our non-federal resources across BPA grid to serve our load.
- By 2030, PGE has an incremental energy need of up to 3,000 MWs of renewables and up to 500 MWs of capacity.
- Decarbonization goals of reducing our green house gas emissions by 80% by 2030.

Education on PGE's Commercial Procurement Practices

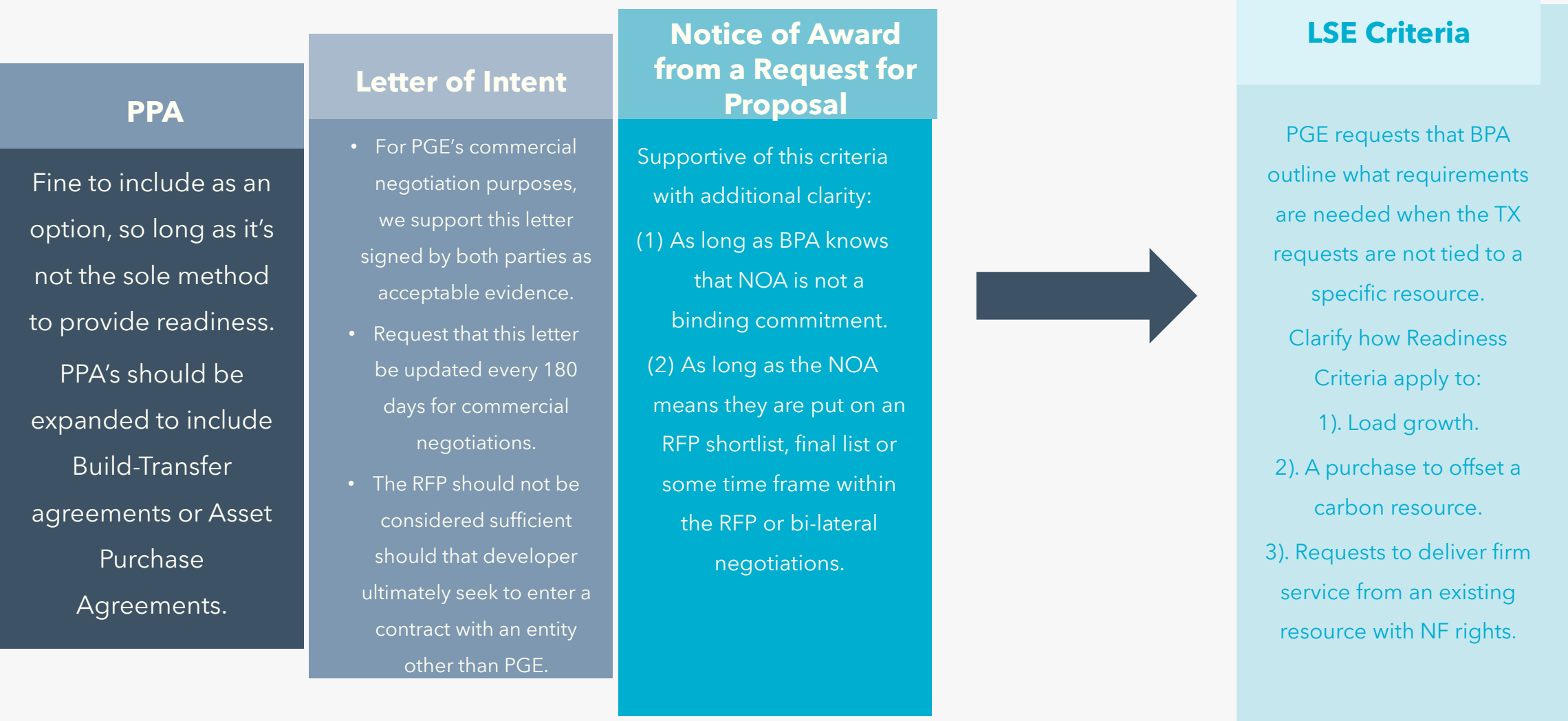
PGE procures resources through different pathways with varying timelines which BPA should be aware of as you finalize the Readiness Criteria.

PGE's RFP Process



GAT Readiness Requirements

Existing criteria is RFP-centric and doesn't account for more common load service entity requests for TX services and for bi-lateral contracts.



Please clarify, if a developer meets the readiness criteria through a PPA, LOI, NOA, are they prevented from taking the transmission to another utility/off-taker.

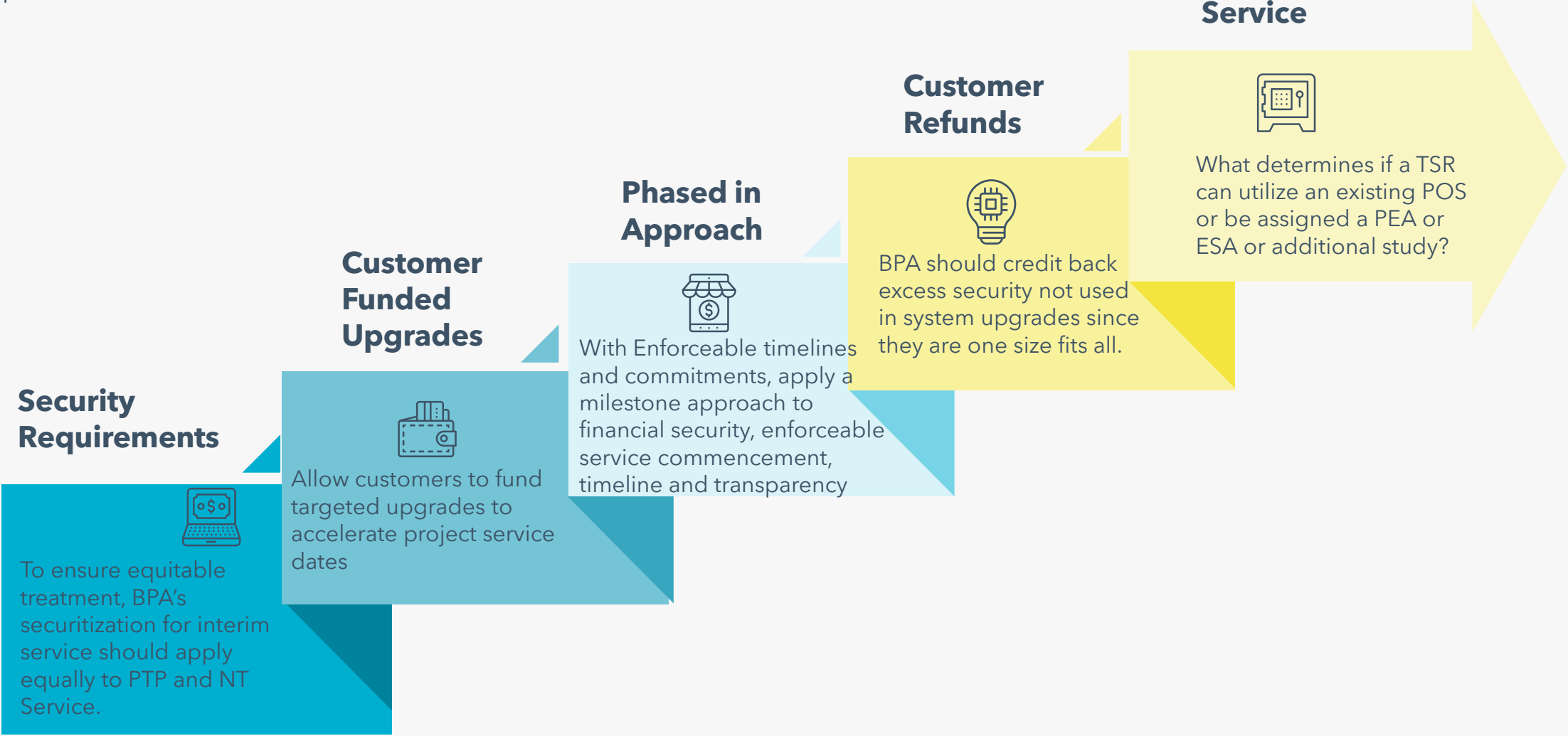
MIDCRemote/NWH Scheduling Point Changes

- PGE appreciates that BPA does not intend to change any granted service at MIDCRemote.
- BPA's proposal outlines that new service from NWH will only be granted as Reassessment CFS (or parallel NITS), with no ability for this service to be firmed up to long-term firm 7-F.
 - If future transmission from NWH were only available as Reassessment CFS, PGE would lose deliverability certainty for long-term PPAs and owned resources at or through this scheduling point, which reduces our resources geographic diversity in the supply portfolio.
- BPA should allow a path to firm service for virtual hubs such as NWHUB.



Long Term Firm Queue Management

Several BPA LTF Queue Management concepts could lead to significant financial and operational impacts. To mitigate for those impacts, BPA should consider the following proposals.



Interim Service



- **Product Questions** - Interim CF has rollover rights? What are the termination rights/security deposit refund? What happens if there's a LOI, security deposit made, and customer chooses not to move forward with the project?



- **Financial cost obligations** - Requirements to post financial security for bridge CFS shifts risks to customers committing to capital before a plan of service/construction details. Consider a phased approach with milestone commitments.



- **Impacts to existing CFS and LTF rights holders** - Maintain existing NOH commitments while making unlimited offers of CF? Customers be kept apprised of increased congestion? BPA's metrics for measuring success of this new product? Suspending NF hourly sales and redirects as indicator of congestion?



- **Clarity needed regarding deferrals** - Can customers defer interim CF-Bridge? Per PGE's RFP process, after a selection of a project it can take several years for construction and integration. CF-bridge deferral protects customers from unnecessary financial obligations.



- **Impacts to major path congestion** - Summary of system studies & curtailment risks assessment BPA has conducted? How will customers be kept apprised of increased congestion? Quarterly workshops/reports?

Areas of Consistent Alignment Across Customer Comments (top 3)

- **General Concerns**
 - Insufficient stakeholder engagement and need for transparency
 - Lack of clarity & impact assessment to planning, procurement, and affordability to customers
 - Undefined future state and metrics for success
- **MIDCRemote/NWH Scheduling Point Changes**
 - Limiting NWH to reassessment CF reduces deliverability certainty
 - Loss of geographic diversity of resources being on firm Tx at MIDC.
 - Need to develop a path to firm for virtual service points/hubs.
- **LTF Queue Management**
 - Stepped/calibrated approach based on risk/build scope with phased-in financial security under clear and reasonable timelines
 - Desired metrics/ What is the plan if queue decrease does not materialize?
 - Request a flow chart to enhance understanding of proposed changes
- **Interim CFS lacks sufficient detail**
 - Concerns regarding degradation of service to existing CFS and LTF rights holders
 - Clarity needed regarding deferrals
 - Shifts risks to customers (upfront capital without BPA commitment/timeline)

Thank you.

Contact:

Laura Green, Senior Principal Strategy & Planning Analyst

Laura.green@pgn.com