



## **PGP Comments on BPA Grid Access Transformation July 9<sup>th</sup> and 10<sup>th</sup> Workshops**

**Submitted via Tech Forum July 22<sup>nd</sup>, 2025**

### **Introduction & Summary**

The Public Generating Pool (PGP) is a collection of nine Public Utilities that work together on issues of common interest. Some PGP members are BPA Network Integration Transmission Service (NITS) customers and some are Point-to-Point customers. PGP members currently purchase approximately 45% of the requirements power sold by the Bonneville Power Administration, own or purchase approximately 8,000 MW of non-federal generating resources, and have combined retail sales in the Northwest approaching 5,000 aMW. While PGP members are situated differently regarding their current and planned direct use of BPA Transmission Service and Power Supply, all PGP members recognize that BPA's ability to plan and build a reliable and adequate transmission system is essential for PGP members and the broader region.

Given the short comment window, PGP cannot comment on the detailed elements outlined in BPA's July 9<sup>th</sup> and 10<sup>th</sup> Workshops at this time, but we look forward to participating in the ongoing process. We commend BPA for putting together such a significant effort and related project plan in such a short time, and we are optimistic about the scope and vision presented in the workshop. PGP has the following recommendations that we believe will enhance the process and improve the overall outcomes:

- 1. BPA's project plan should include a product selection window to mitigate equity concerns.***
- 2. Concepts from the future state should be incorporated in the transitional changes, and the plan should include a full review of the BPs after design of the future state concepts.***

## **PGP Comments & Recommendations**

### ***1. BPA's project plan should include a product-change window to mitigate equity concerns.***

While PGP is encouraged to see such a comprehensive scope of work for this process, the proposed solution set may introduce equity issues between customers. To help mitigate equity concerns, BPA should include a product change window in the project plan now so that participants can consider that as they participate in the reform. BPA should discuss the appropriate timing for a product change window with power customers as soon as possible.

### ***2. Concepts from the future state should be incorporated in the transitional changes, and the plan should include a full review of the BPs after design of the future state concepts.***

While sequencing this effort appropriately will be critical for making changes as quickly as possible, it could result in unintended consequences or missed opportunities for streamlining, automation, and de-siloing of BPA processes. Given there are important implications for the future state as BPA addresses NT load service, queue management, and transitional interim service, we recommend building placeholders into the transition processes that consider the future state. This will enable the identification of opportunities to collect critical information that could inform and enhance proactive planning and future state design and execution. PGP also recommends a comprehensive review of BPs to complete these linkages at the end of the future state concepts discussions.

Some examples of potential future-state concepts that may make sense to incorporate now include:

- Scenario analysis may be introduced in the system planning analysis, so immediate changes to the load forecast submittal guidance should incorporate this concept now. This could provide BPA with critical proactive planning information earlier in the process and enable customer input into the range of scenarios considered for planning.
- The introduction of resource zones could align with BPA's vision of focusing on backbone enhancements, while enabling readiness criteria to be slightly broader and better linked to the proactive-planning elements of GAT.
- Customer build options provide an opportunity for acceleration of buildout and risk reduction. Placeholders in the BPs/new data collection processes and readiness cure process for queue management could, at minimum, flag parties and requests

that may provide opportunities for customer builds. This will not only inform BPA on interest for customer builds, but provide the ability for targeted sequencing and immediate action on the accelerate expansion concept when the time comes.

- If the interim service concept for the transition period is intended to be different from the future version, or transitioned to the future version of that product, this should be clarified and new naming conventions introduced if needed.
- PGP encourages ongoing coordination with power services to ensure any new concepts maintain compatibility with BPA's future participation in a day-ahead market.

### **Conclusion**

PGP appreciates BPA's willingness to consider wide-ranging changes to address the current and evolving challenges with grid access on BPA's system. We look forward to engaging in ongoing discussions and helping to refine the concepts into actionable and equitable solutions.