



PGP Comments on August 19 BPA Grid Access Transformation Workshop

The Public Generating Pool (PGP) is a collection of nine Public Utilities that work together on issues of common interest. PGP appreciates the opportunity to contribute to BPA's efforts to accelerate the expansion of its transmission system and, consistent with its recently published strategic plan, deploy innovative transmission solutions that ensure grid reliability while adapting to evolving customer needs.

PGP offers the following high level recommendations:

1. Explore Ways to Move the GAT Process Faster

Given the pace of the GAT process, PGP is concerned with respect to the timing of implementation for a reformed planning and transmission expansion that meaningfully advances the region's ability to add resources and transmission within the timeframes needed.¹ BPA began the GAT initiative in early 2025 and, 18 months later, we have not progressed substantially beyond identification of principles and objectives. The various planning workstreams and how they interrelate and interact continue to be unclear and convoluted. PGP recognizes that there are considerable constraints on BPA staff as well as a number of critical and resource-intensive initiatives currently underway and that simply asking BPA staff to absorb more work may be unhelpful. However, the reality of accomplishing material reform and the envisioned future state in the timeframe needed is that it will require a much faster pace and higher sustained effort. Hosting workshops approximately once per quarter is very likely insufficient. PGP recommends that BPA explore creative ways to expedite its process and rethink staging and framing. These could include:

- Retain an independent technical consultant or facilitator to evaluate planning and execution reforms already adopted across the country, prepare alternatives, maintain a timeline of issues and decisions, and incorporate stakeholder input into draft proposals.

¹ Several recently published regional and Western reports cite the need for the region to add significant resources and transmission expansion in the near- and longer-term horizons. See <https://www.ethree.com/ra-pnw/>, https://www.nwcouncil.org/fs/19991/ninthplan_2026-3.pdf; https://www.westernpowerpool.org/private-media/documents/WestTEC_10-year_Full_Report.pdf

- Establish an SPP-style representative sector based task force that can publicly meet frequently, at least every week, to establish proposals, identify action items, and maintain a timeline of decisions. If a formal task force is undesirable, establish a more frequent meeting cadence and work to reduce need to develop lengthy materials each week.
- Organize more frequent workshops around discrete decisions and milestones versus preparing detailed and lengthy meeting materials with high level overviews.
- For each workshop, identify decision points and 2-3 directional but defined alternatives and ask that stakeholders identify their preferred option or provide concrete alternatives and proposed modifications. Publish meeting materials at least one week in advance so that stakeholders can come prepared to engage substantively in the workshop.
- Separate directional and foundational decisions from implementation details and remind stakeholders to focus initially on the former.

PGP understands that more foundational change has greater potential to create winners and losers and generate new or different risk profiles for customers. While these risks must be transparently communicated and understood by customers, PGP encourages BPA to move as swiftly as possible toward implementing reforms designed to address identified problems and avoid creating more siloed study processes.

2. Leverage Reforms Adopted by Others.

While Bonneville's system is unique in many multi-faceted ways, the problems Bonneville is working to solve are not unique. Clogged queues and disjointed planning processes are a national phenomenon and several organizations, including Southwest Power Pool (SPP)² and the California Independent System Operator,³ have recently adopted reforms and consolidated planning processes that could form a starting point for Bonneville's approach. These reforms offer useful starting points for identifying potential process structures and readiness requirements, increasing cost certainty, reducing speculative requests and ways to coordinate load and generation interconnection requests with broader system planning.

PGP is not suggesting that BPA simply adopt another organization's framework. Any approach will need to be adapted to BPA's legal obligations, tariff, federal status, customer

² <https://stakeholdercenter.caiso.com/StakeholderInitiatives/Interconnection-process-enhancements-2023>

³ <https://www.spp.org/engineering/consolidated-planning-process/>

base, and the operation of the federal system. Nevertheless, BPA should begin with the reforms and lessons already developed elsewhere and identify which elements can be adapted. Doing so could shorten the design process, reduce implementation risk, and allow BPA and its customers to focus their attention on the issues that are genuinely specific to the Northwest.

As part of its straw proposal, BPA should identify the approaches it reviewed, explain which elements appear applicable to BPA, and describe any BPA-specific considerations. PGP specifically recommends review of both SPP and CAISO reforms given proximity and existing relationships with those organizations.

3. Consolidate Where Possible.

At the August 19 workshop, Bonneville spent some time explaining its planning obligations and various workstreams to address line and load interconnection, generation interconnection, commercial planning, expansion planning, Attachment K Planning, and WestTEC. It is not readily understandable how all of these processes interact and will feed into each other. To the maximize extent feasible, BPA should consolidate as many of these planning processes into a holistic study and planning process that addresses multiple issues and customer needs in a single process.

A more consolidated approach could allow BPA to identify transmission solutions that address several needs simultaneously—interconnecting new generation, serving growing loads, satisfying transmission-service requests, resolving reliability constraints, and advancing longer-term regional expansion. Evaluating these needs separately risks producing duplicative studies, inconsistent assumptions, piecemeal upgrades, and projects that solve only the most immediate constraint rather than providing durable system value.

BPA's next proposal should clearly map the relationship among its existing planning and interconnection processes and explain:

- What information and assumptions will be shared across the processes;
- How needs identified through one process will be incorporated into the others;
- Whether studies can be consolidated or conducted on a common planning cycle;
- How regional planning efforts such as WestTEC and Attachment K will inform BPA's local and subregional planning;
- How BPA may seek partners to execute inter-regional projects identified by WestTEC or Northern Grid planning processes; and

- Where separate processes must be maintained because of legal, tariff, or operational requirements.

Even where complete consolidation is not possible, greater alignment of study assumptions, timelines, scenarios, and decision points would improve transparency and help Bonneville and the region identify the most efficient transmission solutions.

Specific Feedback on August 19 Workshop Proposals:

4. Do Not Align Procurement Requirements Between Load Serving Entities & Transmission Providers

With the exception noted below, PGP generally supports the principles laid out in the August 19 workshop materials for BPA's revised Commercial Planning Process. As noted above, there may be additional application of these principles beyond the commercial planning process and BPA should consider whether some principles apply more broadly to a consolidated planning process.

PGP disagrees with the principle "mitigate planning impact of LSE minimum bid requirements(s)." While PGP agrees with the problem statement, that artificial queue inflation and speculative demand should be addressed, PGP disagrees that aligning procurement eligibility between load serving entities (LSEs) and transmission providers will address this problem. LSE minimum-bid requirements serve purposes that are different from the transmission provider evaluation and planning for new transmission service. Rather than attempting to align procurement-eligibility requirements across entities with different responsibilities, Bonneville should address speculative demand more directly through its own transmission-service and planning rules.

This could look similar to CAISO's approach, where transmission deliverability decisions are tied to procurement activity but do not require LSEs to align bid requirements with transmission providers.⁴ Another alternative could be SPP's approach, where generator interconnection, transmission service, and regional transmission planning studies are combined into a recurring planning process, which avoids the need to individually evaluate independent requests.⁵

⁴ <https://www.caiso.com/generation-transmission/generation/generator-interconnection/transmission-plan-deliverability>

⁵ <https://www.spp.org/engineering/consolidated-planning-process/>

5. Explore Ways to Accelerate Self-Build Option Implementation

PGP is very supportive of the proposed self-build option and believes that it has the potential to materially improve BPA's ability to enable customer requests for service. PGP supports the proposed scope and technical requirements. Bonneville's current proposal is to finalize the self-build option business practices by the end of September 2027. PGP is hopeful that, consistent with the high level suggestions above, there may be creative ways to expedite this process. It would be helpful for stakeholders to understand the tasks and decisions required to publish the business practices and understand whether any of the tasks could be outsourced to external consultants.

6. Explore Ways to Identify Locations Where Resources May More Beneficially Interconnect

PGP recommends that BPA develop a way to communicate information to the region on where resources may be more easily sited and/or areas most beneficially and efficiently served by added resources. Both CAISO and SPP have adopted methods for doing so: as part of its process, CAISO identifies interconnection priority zones and capacity information⁶ while SPP incorporates a siting analysis into its regional transmission planning process.⁷ This enables developers to select viable locations and helps load-serving entities direct their procurement interest. PGP understands that BPA's concern with providing this information is that this type of information requires full engineering studies to be accurate and that customers may protest if the final result is different from an initial high level assessment. PGP also understands that development of this information is challenging due to the size of the current queue. However, PGP strongly encourages Bonneville to explore ways to mitigate risks through transparently identifying where information is preliminary or subject to change. This can and should be something less than a fully engineered solution to help guide developer and customer decision-making processes.

⁶ <https://stakeholdercenter.caiso.com/initiativedocuments/revised-straw-proposal-interconnection-process-enhancements-2023-dec192023%20.pdf?>

⁷ <https://www.spp.org/media/2429/2025-itp-report-v10.pdf?>