



August 22, 2025

Mr. John Hairston
Bonneville Power Administration
Administrator/Chief Executive Officer
Via email: techforum@bpa.gov

Re: Comments Concerning Grid Access Transformation Workshops – Future State Proposals

Thank you for the opportunity to provide the Bonneville Power Administration (BPA) with the following comments. Pacific Northwest Generating Cooperative (PNGC Power) is submitting comments which are intended to shape BPA's Grid Access Transformation (GAT) process, while also expressing concerns based on observations. PNGC Power acknowledges the monumental scale of effort that reformation of the transmission service request process entails. As this reformation process is still evolving and developing, PNGC Power reserves the right to later submit comments on the proposed future state of the GAT process as more information is made available.

As a general matter, PNGC Power is supportive of the BPA implementing a proactive planning model where a transmission service request can be developed from initial request to in-service within 5-6 years. However, the significant changes that BPA has proposed in the GAT process to-date, make it very difficult to fully understand the nuances of how transmission service requests will be managed on a non-discriminatory basis. Absent additional information on the future state, there are too many outstanding questions for PNGC Power to formulate a comprehensive set of comments on how the transmission service queue should function.

As an example, PNGC Power is very concerned about how future costs will be allocated for network load service. How does BPA propose to assign costs going to be allocated for network transmission upgrades in a future state paradigm? If proactive planning is the goal where system builds are completed in anticipation of the needs of the region, the process regarding how projects are chosen to be built and who pays for those projects needs to be explicitly explained and codified.

PNGC Power stands firm on its assertion that BPA's obligation is to proactively plan, maintain and build a transmission system that will ensure reliable, long-term, firm service to its preference customers and the load growth customer's forecast. We look forward to continuing to work with

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the agency and its staff to resolve the current set of challenges together. It's imperative that BPA implement a sustainable solution that addresses the regional needs of its customers. The gravity of the matter warrants strong public process that codifies BPA decisions, obligations, and perhaps most importantly, agency accountability.

Sincerely,

/s/Chris Allen
VP Power Supply and Transmission Contracts
PNGC Power