



August 15, 2025

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

Re: Comments Concerning Grid Access Transformation Workshops

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 help further inform and shape BPA's Grid Access Transformation (GAT) process. BPA's transmission system faces many challenges ahead and we expect that changes may be disruptive, and difficult decisions will need to be made. It is for this reason that PNGC Power strongly urges BPA to consider this process to be the first draft of reform and establish a timeframe and a process to complete an assessment with stakeholders reviewing how changes implemented because of the GAT process have either improved or worsened the planning processes associated with transmission service.

PNGC Power understands BPA's intent to "get off pause" and manage system impacts that can be attributed to New Large Loads (NLL), PNGC Power is concerned by the proposed adoption of a NLL policy within the transmission business line—particularly one modeled after BPA's Power business line's New Large Single Loads policy, which is statutorily required under the Northwest Power Act. Unlike BPA Power's business line, BPA's Transmission business line is not subject to the same statutory obligations, and applying a similar framework, risks introducing inequitable treatment and unnecessary barriers for load-serving entities. PNGC insists that BPA clearly define and strictly enforce how the NLL policy will be used in planning and operations. The NLL policy should be established with a sunset provision once the GAT reforms have been implemented, and proactive planning is achieved. The NLL policy should not be allowed to become pervasive and distorted like BPA's implementation of the New Large Single Load policies.

PNGC Power's concerns can be grouped into several areas:

13 MW Threshold Impact

PNGC Power remains extremely concerned about the proposed increase of 13 MW per Point of Delivery (POD) threshold that prioritizes service based on BPA's categorization of the retail members/customers its preference customers serve.

It has been stated through workshops that the 13 MW threshold will be advantageous by helping reduce the number of existing queue requests that will need to be studied. PNGC struggles to see how this will truly resolve customer's request for long-term transmission service, offering a short-term conditional product simply punts the long-term need down the road with an undefined process and lacks commitment or accountability to ensure long-term firm service. It appears that BPA is anticipating that customers will remain satisfied with the interim conditional firm service of which too many questions are still outstanding: How will firm service be obtained? How will queue positions be managed for those interim requests when the 13 MW requests are studied? How will costs be allocated amongst the parties?

Another point of concern is the point of measurement proposed by BPA staff. Setting the point of measurement at the POD level raises more questions than it appears to solve, while BPA has not sufficiently demonstrated how this will help improve the transmission planning process. PNGC does not agree with a one size fits all approach and individual requests may dictate a more common-sense approach. If a threshold is needed for a NLL, PNGC Power believes that it would be better to manage NLL(s) at the facility level than the POD level. A key question is how will native load growth be treated at a POD where the NLL is also being established? As the facilities are developed for a NLL, specific metering will be designed to meter the load. If the addition of a facility is what causes the impact, the limits should be applied at the facility level rather than the entirety of the POD, mitigating risks to native load growth within a POD. This also raises questions on how BPA plans to treat load increases due to electrification which falls more into a native load bucket than a specific facility load.

Furthermore, calculations for transmission credits will also be much more complex if the POD threshold level is maintained. If simplification of the process is desired, and a threshold is applied, then it should be done at the facility level.

Readiness Requirements

The implementation of a readiness standard is supported by PNGC Power, provided it does not introduce significant procedural hurdles and barriers for customers seeking long-term firm service, particularly for projects that are otherwise viable. BPA's readiness criteria must balance needs to support reliability, fair access to long-term firm transmission, and economic development opportunities. PNGC would like to further underscore its position that resources contributing to regional resource adequacy (i.e. WRAP) must take precedence to support regional reliability.

Security Requirements

As stated in Section 32, BPA's own Open Access Transmission Tariff (OATT), requests for transmission service come with an obligation to pay; thereby negating the oft-cited and rarely experienced "stranded cost" of transmission and thoroughly undermining the need for the additional security requirements. Introducing additional security requirements for Network

Customers is very concerning and directly contradicts the provisions within BPA's OATT. PNGC Power's members serve small, rural communities owned by the members they serve and were established to provide at-cost electric service. The additional security requirements proposed would penalize these rural communities and limit opportunities for the crucial economic development needed in these communities.

Collaborative and Transparent Discussions

PNGC Power believes it is imperative that BPA move expediently to develop solutions that will ensure reliable, cost-effective load service over the long term for all NITS customers. BPA has repeatedly stated that the desire is to work collaboratively to develop a process that moves the transmission service queue "off pause". So far, workshops have provided participants with the opportunity to comment on the materials presented. For stakeholder participants to believe this is a collaborative process; BPA needs to allow more time for discussion of issues during workshops and commit to a process where BPA responds in writing to feedback. Its concerning that BPA staff shrugs off request for written responses and say, "we will try our best". The gravity of the situation warrants more deliberate documentation of goals, metrics and accountability for results. The region cannot afford a mere attempt to do better and hope for improvement. PNGC applauds BPA for acknowledging they have been unable to fulfill their obligation to maintain and expand the transmission system to meet regional needs, so this process calls for more formality than what has been demonstrated to this point.

BPA is proposing major shifts in how Transmission Service Requests will be processed, and staff often rush participants quickly through discussions. For the region to intelligently evaluate and respond with thoughtful comments this discussion is critical to fully understand the scope of the changes BPA is proposing to the process. We have witnessed multiple occurrences where BPA staff contradict one another or describe objectives differently. At times, PNGC staff finds themselves confused about proposal objectives and how BPA plans to measure success. Additionally, it would be helpful if BPA would identify where participant suggestions are being incorporated into the proposed processes. Without the time for discussion and providing detailed feedback, participants are often left wondering if this effort will be a collaborative process or will it be a desktop exercise that falls short of the intended results.

PNGC Power appreciates Bonneville's collaborative approach to meeting the transmission service needs of its customers on a long-term, sustainable basis. It is recognized that there are no easy solutions and that difficult decisions will need to be made. 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. PNGC Power looks forward to continuing to work with the agency and its staff to resolve the current set of challenges together.

Sincerely,

/s/Chris Allen
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