

Submitted to techforum@bpa.gov on April 30, 2026

RE: PPC Comments on BPA's Grid Access Transformation (GAT) Process

The Public Power Council (PPC)¹ is supportive of BPA's efforts to improve its planning policies to be more responsive to customer needs, which will allow utilities to facilitate regional economic growth in their communities and enable compliance with state policies. We appreciate the agency sharing its current thinking on how it plans to deliver a more responsive and effective planning and execution process. PPC looks forward to further developing these concepts by working with BPA and other customers. The comments below are offered as preliminary PPC staff comments in response to the initial information shared at the April 15 workshop.

As a general matter, BPA should be benchmarking and reviewing how other entities are revising their transmission and interconnection planning processes and assessing whether any of these approaches could be beneficial if adopted by BPA. We look forward to hearing more from the agency about what they have learned from reviewing other providers' practices in a future workshop.

Proactive Planning

PPC appreciates the information that was shared in reference to BPA's vision for the agency's new proactive planning process; however, additional information would be helpful to understand how the proposed approach fits with BPA's existing planning processes as well as potential new processes. Specifically, we would like to better understand how the expansion and commercial planning process outcomes work together to result in new transmission projects. What are the specific outputs from each process? How, if at all, are the outputs of each process used in the other process? Additionally,

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members subscribe nearly the full firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

how do the outputs from the WestTEC study (both 10 and 20-year looks) influence BPA's planning process, if at all?

Based on the information provided at this first workshop, PPC is concerned that "sub-grid" areas of BPA's system may not be sufficiently studied through this approach. We request that the agency clearly address how it will study and plan for the sub-grid areas on its system at the next workshop.

In concept, PPC supports expanded use of BPA's local areas reinforcement studies. Additional information and details are important to understanding how this process complements the proposed proactive planning future as well as how local area reinforcement areas will occur generally. PPC requests information on; 1) the timing of developing an expanded local area reinforcement study process, 2) how the agency will determine which areas to study, and 3) how information from the local area reinforcement studies feeds into the expansion and commercial planning studies.

During the meeting, BPA foreshadowed future "product planning" efforts. Additional information on the objectives and scope of this effort would be helpful. Based on some of the comments made during the workshop it was unclear whether BPA is evaluating a combined transmission and interconnection study process. BPA should also address whether different product options that might be pursued will change how various uses of the system are studied.

PPC encourages the agency to develop criteria for determining which projects would be offered at embedded rates early in the GAT process. These criteria should be developed in partnership with customers who will bear any rate impacts resulting from the decision. Similarly, BPA should work with customers to adopt principles to guide the process. In those principles, the agency should capture its commitment to plan to help load serving entities in the region serve load growth. Along with developing criteria and principles, BPA should also establish a clear process for determining if principles and criteria are being met in its planning process and by the transmission projects being advanced by the agency.

PPC and our member utilities would like to understand the anticipated process for discussing study and capital funding for identified projects as part of the new proactive planning process. Some policies related to project funding could be helpful in informing how elements of the commercial and expansion processes are designed. An iterative discussion on these details could be beneficial. It would be helpful to understand where and how these policies will be developed.

Lastly, as PPC and other entities engage in settlement discussions for TC-27, it would be helpful to understand how BPA plans to transition from that process into the new planning process. BPA should address this directly.

PPC appreciates BPA's willingness to evaluate new approaches to planning its transmission system and we look forward to continuing discussions on how to design a process that will meet the needs of the region.

Enhanced Expansion

PPC supports BPA's efforts to improve its project execution. Progress in this area will be critical for ensuring the region is able to integrate new resources and meet growing demand.

As a general statement, we are appreciative of BPA's review of its processes and organizational structures to identify potential areas for improvement. We support continuing this review and evaluation. In addition, a look back once changes have been made to evaluate their effectiveness should be established to determine if the anticipated efficiencies are being achieved as a result of adopted changes.

We look forward to more information about the Transmission Infrastructure Delivery and Execution Strategy (TIDES) process as BPA continues to stand it up. To communicate progress with customers, we recommend the agency develop a regular reporting structure that evaluates how the cost of the TIDES process compares with in-house project management and construction.

PPC continues to support the development of customer constructed facility options. This should be a priority in the enhanced expansion effort.

Conclusion

PPC is supportive of BPA's efforts to improve its ability to meet customers' transmission needs. Significant additional engagement with customers, benchmarking research, and potential expanded use of analytical tools can help refine BPA's proposed approach, and we welcome those continued discussions.