

Submitted to techforum@bpa.gov on September 11, 2026

RE: PPC Comments on BPA's August 19, 2026 GAT Workshop

The Public Power Council (PPC) appreciates the agency's continued efforts to improve BPA's transmission planning processes. BPA's new strategic plan outlines an ambitious vision for transmission expansion, and PPC looks forward to partnering with the agency on the details for pursuing that vision – including through the reforms being examined in the Grid Access Transformation (GAT) process.

During the August GAT workshop, the Administrator mentioned that he has directed staff to continue looking for opportunities to streamline and expedite BPA's transmission planning processes. PPC is highly supportive of those efforts. Continued improvements in these areas would not only help ease the burdens of going through BPA's planning processes, but also reduce uncertainty related to regional supply and demand - which is exacerbated by long lead times for study results that inform which projects are viable, from both a financial and a timeline perspective.

Along these lines, PPC continues to encourage BPA to seek opportunities to pursue a more holistic approach to transmission planning. While PPC appreciates the educational background on BPA's transmission planning process that has been provided in the recent workshops, including the helpful diagrams showing the relationships between the multiple workstreams, the need for this ongoing education emphasizes the complexity of BPA's existing processes. As the agency progresses towards the type of expansion envisioned in its strategic plan, this streamlining will be all the more important. PPC members have been generally supportive of investing in agency staff to help BPA achieve its mission but understanding what work staff are doing and how it relates to the agency's strategy is important to that support. Achieving support for growing a complex series of study processes that in some cases can appear duplicative is more difficult, especially amid current affordability concerns.

PPC looks forward to continued discussions on these issues and is eager to hear concepts that the Administrator and BPA staff are exploring that may address these issues. Generally, we remain supportive of the reform efforts already in flight and offer the following comments in response to BPA's August 19 GAT meeting.

Expansion Planning

As PPC stated in its June 30 comments on GAT, the proposed expansion planning process is an improvement over BPA's current approach; however, we would like to see greater integration of

these enhancements into current study processes, instead of adding an additional study process. So far, discussions have seemed to silo this work from other relevant workstreams, such as the commercial planning process and RAPID, which are both part of the GAT workstream.

The specifics around how High Opportunity Transmission (HOT) projects will be identified, funded, and their capacity subscribed are important details that have not yet been addressed. It is unclear if the policies adopted in the commercial planning process would apply to HOT projects. It is likewise unclear whether projects identified through the commercial planning process, local areas reinforcement studies, or Attachment K planning could become HOT projects. We look forward to more discussions on the relationship between the expansion planning studies and other efforts.

Commercial Planning

The outcomes of the commercial planning discussion are of high interest for PPC members. PPC members fund a large portion of BPA's transmission revenues and will bear a significant amount of the costs of any projects pursued at rolled-in rates – this is not to say that PPC is opposed to further expansion. On the contrary, PPC members support strategic investment in BPA's transmission system and look forward to working with the agency on establishing revised rules that will allow for transmission expansion, while not exposing existing customers to unacceptable risk.

PPC is largely supportive of the principles presented at the August GAT workshop for commercial planning, subject to some refinement and additions below.

Prioritize Readiness Over Strict Adherence to Queue Priority

PPC is generally supportive of this principle but would like to better understand how “readiness” will be measured. Will readiness be evaluated through evaluation criteria? Would those be adopted in the TC-27 process? We would also like to better understand whether, and how, this principle applies to the “RAPID” products introduced by BPA.

Mitigate the Impact of LSE Minimum Bid Requirements

It is well understood that the impact of requiring transmission for entities bidding into RFPs is challenging for BPA. However, it is unclear to PPC whether mitigating this impact should be a principle of the process, as the minimum bids required for RFPs are outside of BPA's control. The proposed principle recommends that it “align procurement eligibility requirements” that are not set through BPA processes. This principle is likely addressed through a focus on “readiness” or other approaches that are within the agency's control. We also support BPA continuing to provide education on the challenges arising from current requirements and working with entities that establish these bid requirements, so that they may create policies in line with the processes of BPA and other regional transmission providers.

Integrate Planning Queues/Studies to the Degree Possible

Consistent with PPC's prior comments, we are highly supportive of BPA seeking ways to integrate its multiple queues and study processes.

Align Financial Standards to Commercial Transmission Risk

PPC understands the agency's desire to ensure that "major capital-intensive transmission builds are backed by financially viable transmission service requestors." Generally, PPC shares that concern and supports the agency making changes to its policies to ensure that it does not take on costs to provide service to entities that are likely to walk away from taking transmission service; however, it is unclear how this principle would be applied under a new paradigm where BPA is pursuing "proactive planning" and building in advance of specific transmission requests for service. PPC would like to better understand whether this principle applies only to certain types of projects (e.g., only projects that are identified specifically through the commercial planning process). We would also like to understand what level of "backing" for projects is required and whether there is any relationship between this principle and ongoing discussions about BPA's leverage policy.

Business Model Supports Regional Goals

Generally, PPC supports BPA's policies advancing regional goals. We would like to better understand how these goals are defined. As locally controlled utilities, it is important to PPC members that their goals and interests are considered in defining regional goals – along with state and federal objectives. In a future workshop, we would like BPA to address how these goals will be defined and whether there will be an opportunity for stakeholder feedback on the priority among any identified regional goals.

Potential Additional Principles

In addition to the principles identified by BPA, the agency should consider a principle to "align financial risks and benefits associated with future builds." Today's approach to commercial planning through its TSEP policy accomplishes this goal by having entities that will receive the benefits of a new build through new transmission service also bear the costs and risks associated with constructing the build. This includes customers funding their share of costs for studies associated with the build and being required to securitize commercial transmission projects. While this specific policy may not be the right balance among other priorities, there is a clear tie between the entities that benefit from a build and their bearing of the financial risk associated with planning and capital construction. We would like to see the relationship between risks and benefits addressed in BPA's eventual proposal.

Additionally, BPA should consider adding principles related to transparency. PPC would like to see a commitment to continued transparency on the costs, timeline, and overall business case of projects resulting from the commercial planning process. To meet this principle, the agency should establish a process for meeting with customers to seek comment on proposed projects that result from its commercial planning process, as well as its expansion planning process. Such a

public process should occur before BPA makes a final decision on project construction, as customers will ultimately bear the cost of future builds through their transmission rates.

Ensuring the durability of BPA's studies should also be included as a principle of the process. If the agency has to restudy requests or projects become no longer viable because other requests dropped out of the queue, that adds time and cost to the process.

Lastly, BPA should have a principle related to the timeliness of the transmission study process – or of offering customers transmission service. At the beginning of the GAT process, the agency discussed a target of being able to offer customers transmission service within five to six years of their initial transmission request. PPC would like to see a principle aimed at capturing the need for a shorter timeframe between transmission requests and transmission service.

Accelerate Transmission Expansion

PPC continues to support BPA's efforts to accelerate its transmission expansion and capital execution. In particular, PPC members are highly interested in the adoption of the "customer build option." We encourage BPA to implement this option as soon as possible, even if it is done initially on a pilot-project basis. PPC supports the scope of the program as shared at the meeting – including study, procurement, and construction as customer-led opportunities under the program.

PPC commends BPA on implementing its TIDES program. We encourage the agency to establish success metrics related to this effort, to benchmark whether the implementation of TIDES results in lower costs, faster implementation, or other benefits for BPA and its customers.

Rapid Access Products & Interconnection Delivery (RAPID)

PPC is supportive of the objectives identified in BPA's presentation that are driving the RAPID effort: deploying fast-tracked products and services, enforcing strict cost allocation, and looking beyond the traditional TSR model. At this time, we are limited in our ability to provide much feedback on the RAPID products given the level of detail discussed during the workshop. The concepts related to RAPID are promising, but the process, costs, and quality of product resulting from this approach are unclear. We look forward to discussing these concepts in further detail with BPA.

To inform those future discussions, more information on the scope of RAPID would be helpful – for instance, which, if any, queues are bypassed when a request receives a RAPID "product." We would also like to better understand the impact that RAPID products have on:

- BPA staff's availability for other studies (including expansion planning, commercial planning, Attachment K planning, and interconnection studies)
- Lower-queued requests (across any impacted queues)
- Existing service
- Conditional firm service offered through TC-27 CF studies

We appreciate BPA's creative thinking on this issue and its review of practices established by other transmission service providers to help inform potential new approaches.

Grid Expansion and Reinforcement Portfolio (GERP) Update

PPC appreciated the updated information on the GERP projects presented during the workshop. The new tables included in the presentation were helpful. PPC is also very appreciative of the creation of the interactive map to communicate the location, estimated in-service date, and projected costs associated with GERP and other BPA transmission planning projects. This is a particularly helpful tool for customers, and we look forward to its continued evolution. As part of that evolution, we ask that original forecast costs and in-service dates for these projects be included on the map and in project reports to help inform whether these estimates change over time.

It would also be helpful to highlight which GERP projects BPA has decided to construct at embedded transmission rates, which projects are still being evaluated for future funding and rate treatment, and, for those projects still under evaluation, what stage of the decision process they are in.

Conclusion

The transmission reforms that BPA is undertaking are central to ensuring that the region can meet its energy needs for the future. We are supportive of the steps that BPA has already taken to advance needed reforms, and we look forward to continued evolution during the agency's next chapter. We appreciate the hard work of BPA staff to identify and evaluate potential solutions as part of this effort.

Sincerely,

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