

Submitted to [techforum@bpa.gov](mailto:techforum@bpa.gov) on July 21, 2025

**RE: Preliminary PPC Comments on Transition Issues Related to BPA’s Grid Access Transformation**

The Public Power Council (PPC)<sup>1</sup> appreciates the opportunity to comment on the Bonneville Power Administration’s (BPA) Grid Access Transformation (GAT). We appreciate that the agency is prioritizing making improvements to its transmission processes and understand that the timelines proposed by BPA are in the interest of moving the planning process off pause and responding to customer needs. Given the tight timeline to submit comments and the evolving nature of details presented at BPA’s July 9 and 10 workshops, we submit these comments with the caveat that they are preliminary in nature, and we look forward to additional opportunities to submit comments as proposals are further developed and refined. The opportunity for additional comment is particularly important as in some areas customers do not have a common understanding of proposals and will need more information to make thoughtful, informed comments in this process.

**The Overall Vision for Grid Access Transformation Provides a Promising Framework**

As a general matter, PPC supports BPA’s concept of exploring creative ideas to enhance the quality and responsiveness of the agency’s transmission services consistent with the goals of the Grid Access Transformation project. Communities in the Northwest are relying on BPA to continue to provide reliable transmission service throughout the region, delivering on its historic mission to electrify the Northwest. The six-point framework shared by BPA at the July workshops is a promising starting point for developing a responsive future state. In particular, PPC is supportive of BPA’s pursuit of proactive planning and enhancing its transmission construction capacity to achieve a future state that better meets the needs of customers in the Northwest. There are many outstanding details on the implementation of these concepts and those details will be critical to the success of this effort.

Along with considering out of the box solutions, BPA has also indicated openness to working more collaboratively with customers through “deep dive” working sessions. We appreciate the agency utilizing a different approach to customer engagement and hope that BPA continues to evolve its stakeholder engagement throughout the GAT process to best incorporate customer

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<sup>1</sup> 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 fully subscribe the 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.

perspectives. The type of transformation that BPA is seeking will not be achievable without customer input and support.

### **Transition Process Timing**

PPC appreciates that BPA has acknowledged the tension that exists between the need to move quickly to “get off pause” and the need to carefully and thoughtfully develop holistic solutions to its transmission challenges. The two-part approach developed by BPA, which includes near term work to “transition” BPA’s planning processes and a longer-term “future state” to implement more transformative change, makes sense to address this tension. At this time, it is unclear to PPC whether BPA’s November timeline for adopting changes to facilitate the transition portion of the agency’s plan is reasonable or achievable; this is due to the somewhat limited information available on the scope of the changes that BPA will be pursuing in its upcoming business practice revisions. We hope to have a better sense of the chance of success after BPA publishes its “pink line” business practices at the end of this month.

With BPA’s two-part approach, the agency should clarify which issues that are being addressed in the transition phase will be open for discussion once the agency turns its attention to the future state and which, if any, issues will be considered “closed.” BPA must provide some assurance to customers about when and how changes adopted to meet transition needs will be revisited to ensure they fit holistically into the future state.

### **Interim Service**

Additional clarity is needed on the interim service solutions that will be sought in the short term as compared to the long-term, and whether decisions made in the short-term transition process will serve as a precedent in the longer-term future state discussion. Again, PPC applauds BPA’s willingness to consider novel solutions to enable service for its customers but wants to ensure that there is robust discussion and analysis around these solutions to avoid any potential unintended consequences.

For example, we anticipate it will be difficult to provide feedback on proposed changes to BPA’s conditional firm methodologies without understanding 1) the magnitude of requests that may be offered under an updated approach and 2) the duration where such conditional firm service offers may apply. More information from BPA is needed to help analyze impacts on existing service, which should be a key criterion in determining whether to move forward with proposed changes.

It is also critical that as BPA considers how to make interim service offers, the agency prioritizes establishing parity between NT and PTP service offerings. For example, 6 NN and 6 CF are not comparable products.

### **NITS Forecast**

PPC supports BPA’s goal of providing certainty for NT customers about whether their load will be served through developing a more formalized policy on how it handles planning for its NITS forecasts. At this time, it is unclear whether BPA’s proposed approach adequately achieves that objective. A more robust discussion is needed on how this alternative will impact customers. Some areas for additional discussion and clarification during the next discussion:

- If BPA continues to propose that this evaluation be imposed at a POD level, BPA must provide additional details on how it intends to retain parity among customers in the application of this policy. Customers often have unique load service circumstances which can complicate the application of this policy at a POD level including but not limited to the number of PODs serving a customer's load, behind the meter resources, and whether the customer is directly served or served by transfer.
- The discussion around NITS forecasts has been focused on the planning process, but there are timing and cost allocation implications of this alternative as well that should be considered. These should be specifically identified and evaluated before BPA moves forward with a preferred option.
- BPA should clarify whether the current 70% confidence policy will continue to be applied to customer forecasts. If so, what actions is BPA taking to ensure consistency in the application of that policy? How does the application of this policy align with the "disruptive" thinking that is being used to develop other aspects of the Grid Access Transformation?
- Does the LaRC continue to be the tool for entities to submit their long-term forecast? Is that the same in the transition and future state? Will the LaRC be undergoing a review during the process to ensure it is facilitating data sharing as intended?

### **Readiness Criteria**

A robust discussion is needed on the proposed application of readiness criteria. If applied, such criteria should balance the interests of removing "speculative" requests with the need to not overly constrict the ability of the region to integrate new generation and load. PPC understands that BPA is considering a financial readiness metric which is likely an appropriate inclusion in the policy to allow some level of additional flexibility. We look forward to hearing more perspectives on appropriate readiness criteria from stakeholders and BPA in the next workshop.

During the upcoming business practice discussions, we would also appreciate BPA clarifying which readiness criteria requirements are as proposed as interim solutions and what policies are anticipated to continue on into the future state.

### **Conclusion**

The change sought by BPA is not a small lift and PPC appreciates the agency's willingness to take on this challenge. PPC and our members are prepared to work hand and hand with BPA to develop transformative solutions that will stand the test of time. We appreciate that the agency is indicating an openness to continued dialogue and collaborative policy development.

Thank you for your consideration of these comments,

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