

Submitted to techforum@bpa.gov on August 22, 2025

RE: Preliminary PPC Comments on BPA's Grid Access Transformation Future State Concepts

The Public Power Council (PPC)¹ appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) Grid Access Transformation (GAT) initiative. We applaud the agency prioritizing improvements to its transmission processes and understand that the short timelines proposed by BPA are in the interest of moving the planning process off pause and responding to customer needs. As with previous comments, given the tight timeline to respond and the evolving nature of details presented at BPA's July 9 and 10 workshop, 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.

As we have stated previously, PPC continues to support the objectives of the Grid Access Transformation (GAT) effort. Access to reliable transmission in a timely manner is critical for PPC members to serve the needs of their communities. Currently, many PPC members are uncertain whether they will be able to access the transmission required to meet their communities' needs. For some, this need is centered around continued reliable delivery of federal generation. For others, it includes a need to reliably integrate non-federal generation which is critical for retaining regional reliability. And, for some, it includes the need to timely integrate new load on to the system which represents growth and economic opportunities for the communities they serve. GAT should collectively aim to address all these situations.

PPC Supports BPA's Future State Concepts

At a conceptual level, PPC supports the vision for the future state of BPA transmission as shared at the July 9 and 10 workshops. Pursuing a proactive planning process and enhanced project execution would provide significant benefits to BPA customers and the region. Currently these concepts have only been discussed at a very high level and the specific details will be critical for ensuring these initiatives achieve their intended outcomes.

As BPA further develops the "accelerate expansion" aspect of its proposal, we would recommend that the scope be expanded to make all BPA transmission project execution more

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 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.

efficient, whether a specific project is related to “expansion,” interconnection, or reliability. PPC also strongly supports the concept of partnering with transmission customers to provide them opportunities to construct facilities on behalf of BPA where appropriate. This type of partnership would benefit all BPA customers by allowing the agency to focus on large regional projects and allowing its customers, who may be able to complete smaller scope projects at lower cost on a faster timeframe, take on those smaller scope projects.

Grid Access Transformation Discussions Must Address Cost Allocation and Risk Exposure

BPA has yet to address cost allocation and risk exposure issues in any GAT discussions – whether they be related to the transition timeframe or the future state. These are critical issues which must be identified and addressed directly as part of a holistic transmission solution. In the context of the future state, this could mean a significant paradigm shift in who is exposed to the risk related to new capital projects pursued under BPA’s commercial planning process. Under TSEP, customers requesting service enabled by future build held much of the risk related to specific projects. PPC understands the interest in exploring alternative risk allocation approaches to facilitate more transmission projects moving forward; however, as policies are developed it will be critical that there are logical relationships between how new transmission capacity is allocated, how decisions on the construction of new builds are made, and who is exposed to the risk of stranded investments.

Project Decisions Must Be Transparent, Consistent with Agency Strategy and Incorporate Customer Input

Any risk “taken on” by BPA related to these builds will be passed through to its existing transmission customers through their transmission rates and therefore BPA’s existing transmission customers must have a significant role in BPA’s decision-making process. Decisions on project construction and allocation of transmission capacity must be done transparently with the input of existing customers. To do this, BPA should develop a public process for sharing information about proposed projects and provide a formal opportunity for customer feedback. Information and decision sharing related to TSEP and Evolving Grid projects over the last several years has felt ad hoc and has not involved customers until after decisions have been made.

As part of the justification for any proposed project, the agency should clearly explain how the investment advances BPA’s strategy, as well as discuss the business case associated with the specific project. It will be important to describe how the project will address regional and/or customer specific needs, the strategic and/or long-term benefits of the build, and anticipated revenues associated with service provided by the build. Pulling together this full picture transparently for customers will be important for gaining customer support both for BPA’s planning process and also for future spending levels and associated rate impacts that may be needed to support new investments.

PPC Supports Adopting Future State Features Sooner than the 5-Year Estimated Timeline

It is PPC’s understanding that BPA is looking to fully implement proactive planning practices and “enhanced expansion” approaches in about five years. We would like to explore with the

agency implementing some, if not all, of the improvements scoped under these workstreams more quickly. These approaches to project planning and capital execution will benefit all customers if they are thoughtfully designed and well executed. While we understand there may be some limitations on how quickly the agency can implement some aspects of its proposal, we encourage BPA to explore whether some improvements can be adopted in a nearer timeframe. For example, if BPA identifies opportunities to improve its project execution that it could implement today, the agency should pursue those as quickly as possible even if not all aspects of the “enhanced expansion” effort are ready to be deployed.

This is not to say that BPA should rush through development or implementation of its “transition” process. The agency’s transition policies are critical for maintaining equity among all its customers and will require planful design and implementation.

Establishing Ongoing Reporting and Metrics Critical for Ongoing Improvement

PPC supports BPA thinking creatively about how to solve transmission challenges. The types of changes envisioned in the GAT process are significant deviations from how business is done today, and the envisioned future state could create meaningful benefits for BPA’s customers and the region. It is important that the agency commits to providing regular reporting on the progress of this initiative. This regular reporting should be paired with established success metrics to determine whether the adopted changes are having their intended effect and to inform whether additional changes to policies or processes may be needed. This information will be critical for allowing ongoing improvement to BPA’s processes; particularly in a time of significant change that is impacting both demand patterns and the composition of available supply across our region.

GAT Proposals Must Be Consistent with Other Agency Priorities

As the details of the GAT proposal are developed, BPA and customers must work together to ensure that the outcomes of this process are consistent with other agency priorities. Such priorities include the implementation of the Provider of Choice contract, involvement in the Western Resource Adequacy Program, and participation in Markets+. Ensuring consistency across these initiatives should be a foundational principle guiding the development of GAT proposals – both transition and future state.

PPC Requests that BPA Respond to Customer Comments Received to Date

While we appreciate that BPA is adjusting its engagement schedule based on customer interest to present individual perspectives, we are concerned that the updated customer engagement schedule released earlier this week extends the timeline for customers to hear BPA’s response to their previous comments and stalls some aspects of the conversation. The comments we are submitting today are the third round of comments that PPC will have submitted since the July 8 and 9 workshop and it is not clear how BPA is incorporating those comments into the development of GAT. Customer presentations made during the customer-led workshops in May have also not received a sufficient response. For the upcoming customer-led workshop in September to be meaningful, agency staff must come prepared to ask questions and share initial reactions in real time.

Conclusion

PPC stands ready to partner with BPA to do the difficult work of systematic change that will be required to support the BPA's future state vision; however, we must be brought along as part of the process. We appreciate the expertise and perspective of BPA staff which have informed proposals to date. As the agency further develops its future state proposals we will all benefit from establishing common understandings of problem statements, clear definitions of success and evaluation criteria, and exploring potential alternatives. Walking through these details with customers and including their input in proposals will strengthen the partnership between BPA and its customers as we take on this challenging issue.

Thank you for your consideration of these comments,

Lauren Tenney Denison
Director, Market Policy & Grid Strategy
Public Power Council