

Submitted to techforum@bpa.gov on August 15, 2025

RE: Preliminary PPC Comments on Transition Issues Related to BPA's Grid Access Transformation & July "Deep Dive" Session

The Public Power Council (PPC)¹ appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) Grid Access Transformation (GAT) effort. We applaud the agency prioritizing improvements to its transmission processes and understand that the timelines proposed by BPA are in the interest of moving the planning process "off pause" so that it can address to customer needs. As with previous comments, given the tight timeline to respond and the evolving nature of details presented at BPA's July 29 and 30 "deep dive" session, we submit these comments with the caveat that they are preliminary in nature. We look forward to additional opportunities to submit comments as GAT proposals are further developed and refined.

PPC Continues to Support BPA's Efforts to Improve Transmission Service in Partnership with its Customers

As we have stated previously, PPC continues to support the objectives of the GAT effort. Access to reliable transmission in a timely manner is critical for PPC members to serve the needs of their communities. PPC supports BPA pursuing a more strategic planning process, exploring the identification of "no regrets" projects, and enhancing its project execution. These aspects of the described "future state" are very appealing and will benefit from additional refinement and customer input.

Seeing the language provided as part of BPA's "deep dive" on July 29 and 30 was helpful to better understand aspects of BPA's "transition" proposal. However, at this time we find it difficult to provide specific, new, substantive comments on that proposal. BPA has received multiple rounds of comments from customers that it has yet to respond to which makes it difficult to continue to provide constructive input. For example, there are significant outstanding policy questions which customers have raised around aspects of BPA's proposed policies. Instead of responding to those comments, the "deep dive" in July was focused on implementation of those policy directions, which in some cases do not have broad customer support. It is unclear whether BPA is open to making changes in these areas consistent with

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.

previous customer comments or whether decisions on aspects of the GAT proposal have been made. Understanding this would help customers determine whether further discussion and debate of specific policy questions is beneficial or whether time is better spent on refining business practices and processes.

PPC acknowledges that transitioning from the current state to the future state will be challenging. This transition will be most successful if BPA brings its customers along in the discussion so that they can provide input and better understand the agency's ultimate direction. We appreciate BPA leaning in to explore different approaches for customer engagement; additional adjustments to this engagement will help achieve a more successful conclusion of this process. More frequent and robust discussions are needed to gain broad customer support for BPA's transition proposal. We offer some specific recommendations below.

Recommendations for Customer Engagement on Proposed Business Practice Changes

PPC appreciates the conversations that BPA has held to date; however, there are still significant outstanding questions and a lack of consistent understanding about some of the agency's proposal. To address these issues BPA should hold at least two more workshops to discuss transition policies and business practice language prior to entering the formal business practice process. During these workshops, we recommend BPA structure the discussion to provide:

- 1) Clarity on policy development and decisions.
 - To do this BPA should clearly summarize any areas where policy decisions have been made and explain the reasoning for the proposed direction.
 - Agency staff should summarize the alternatives considered and the criteria used to evaluate those alternatives.
 - BPA should also clarify where these decisions will be formally codified (will it be included in a Record or Decision, policy direction document, or only in business practice updates).
 - Open policy questions where BPA is seeking feedback should be clearly identified to maximize constructive customer engagement.
- 2) Opportunity to review and discuss Business Practice language/implementation details in a "working session" format.
 - BPA should publish draft business practice language for customer review in advance of upcoming workshops.
 - The agency should solicit specific comments/edits/clarifications on the published language in advance of the workshop to inform the working session discussion.
 - BPA should take live notes/proposed edits during the meeting.
 - A similar format was used during the Provider of Choice contract development process and could serve as a helpful template.
- 3) Opportunity for customer perspectives.

- Time should be allotted for customers to present their perspectives. To make this opportunity more effective, the expectation must be that the customer will bring specific proposals or concepts for consideration BPA and of other stakeholders.
 - BPA should be prepared to engage on customer proposals in real-time. The current timeframe for the agency responding to customers' perspectives has not allowed for customer input to be adequately incorporated into BPA's proposals. It also creates uncertainty around the status of policy decisions.
- 4) Clear expectations for the relationship between the transition state and the future state.
- Any policy decisions or leanings should be clearly communicated to indicate if it is relevant to the transition state, the future state or both.
 - BPA should maintain a "parking lot" or "action item" list for issues related to the future state which should be discussed in subsequent meetings.
 - The agency should clearly identify a process for reviewing the decisions made during the transition process as part of the future state to see if adjustments are needed.
 - This will require clearly identified objectives and associated metrics to track success of those objectives.
 - It will be important to note areas where the objective in the transition state may differ from objectives in the future state.

BPA Must Chart a Clear and Thoughtful Path Between the Transition and Future State

PPC would like to better understand the specific objectives of the "transition" state and how these objectives connect to the future state that BPA envisions. There has been some high-level discussion about alternative approaches considered by BPA at previous workshops, and more explanation on how these alternatives were evaluated would provide helpful context.

Some specific aspects that PPC asks BPA to address in charting out the path to the future state include:

- What is the anticipated duration of the transition period. What happens if the duration is extended? How will BPA mitigate potential risks to achieving the "future state" vision in a timely manner?
- How and when will decisions that are made for the transition period be reevaluated as part of the future state discussions?
- What assurances will customers have about the quality and consistency of their "transition" state products? Is an offer of interim service a commitment from BPA to eventually provide firm service? What actions will the customer be expected to take to ensure that they can receive firm service given the uncertainty results of the future state planning process?

BPA should also include a conversion window as part of the transition to the future state. Aspects of the transmission service products that BPA currently offers may be substantially

impacted by GAT and customers should be offered the opportunity to evaluate whether alternate products would better serve their needs.

Continued Monitoring, Reporting and Metrics Will Be Important to Measuring Success

It is important that BPA clarify what “success” of this effort looks like – particularly regarding the transition state. The objectives shared in the July 9 and 10 presentations provide some context, but not measurable criteria or success metrics. PPC asks that BPA establish those metrics as part of this process and make a reporting commitment going forward.

PPC would also appreciate an evaluation of other related reform efforts such as the recent Generation Interconnection (GI) Reform. At the most recent workshop BPA seemed to imply that the GI reform had not had the anticipated impact on the GI queue. Additional discussion on lessons learned from the GI reform process would be helpful to inform GAT development.

Conclusion

PPC appreciates BPA’s efforts to improve transmission services for its customers. The type of changes that BPA is pursuing will not be easily achieved, and we thank the agency for its commitment to work with customers to ensure it is able to meet the needs of the region. PPC and our preference customer members have been longstanding partners of BPA, and we stand ready to continue that partnership through as the agency transforms its transmission processes.

Thank you for your consideration of these comments,

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