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Via email

U.S. Department of Energy
Bonneville Power Administration
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RE: PRITCA Comments on GAT/BPA Future State

The Pacific Northwest Renewable Interconnection & Transmission Customer Advocates ("PRITCA") provide the following comments on the Future State to be discussed at the September 4, 2025, Grid Access Transformation Project ("GAT") workshop.

While there is little available information on what the Future State proposal may contain, any Future State must meet the following minimum criteria:

- *Clearly define the problems being addressed and how they will be solved.* To date, BPA has not clearly set forth its goals, how or whether its proposed solutions would accomplish those goals, or what metrics it might use to measure success.
- *Support robust competitive markets* with barriers to entry minimized to the greatest extent possible.
- *Be non-discriminatory*: BPA should not favor one group of customers over another, even indirectly through rules that may appear facially non-discriminatory but in practice favor one group of competitors over another. Similarly, BPA must not impose rules that foreclose some business models, such as merchant generation, but allow others.
- *Support regional investment*: Rules for interconnecting and transporting power in the Pacific Northwest must provide a stable platform that provides the predictability needed to ensure investment in the regional generation fleet and transmission system. BPA must not undermine investment by retroactively changing the rules on customers who submitted TSRs or otherwise made significant investments based on the expectation that the rules in place at the time the investments were made would remain in place.

- *Permit flexible use of the grid:* Redirects, including long-term redirects, and other features of BPA's OATT that permit flexible use of transmission rights must be maintained and enhanced. Flexibility is one of the keys to maximizing the value of the existing grid.
- *Planning should be pro-active*: Planning should anticipate where loads will grow, where resources (especially renewables) will be constructed, and where transmission constraints are likely to develop, and should plan and construct transmission in advance of these transmission demands developing. The current system of transmission expansion is largely reactive to filing of TSRs and the network upgrades projected to be needed to accommodate these TSRs, and much of the current problem with queue congestion can be traced to this reactive approach. PRITCA believes Evolving Grid is a solid first step in the direction of proactive transmission planning and construction.
- *The value of existing transmission assets should be maximized:* This requires rules that allow flexible use of transmission capacity that would otherwise remain unavailable, study assumptions that reflect current realities and that are not overly-conservative, and rapid deployment of capacity-maximizing advanced transmission technologies.
- *Equitably distribute the burdens of transmission construction to reflect cost causation principles.* The current system places essentially the entire burden for financing network upgrades on interconnecting generation. This violates cost causation principles because it is well recognized that network upgrades benefit all customers. Thus, any Future State must impose the burden of financing network upgrades on all customer classes, not just interconnecting generators.

In developing the Future State, BPA should consider solutions that have been studied or implemented elsewhere. In particular, PRITCA commends two studies to BPA for careful review and consideration:

- Elaine Hart, *Toward a More Holistic and Adaptive Treatment of BPA Transmission Rights in Northwest Utility Planning and Procurement Processes,* GridLab & Sylvan Energy Analytics at 9 (Table 3) (available at: Sylvan-and-GridLab_Renewables-Transmission-Rights.pdf).This study identifies a number of reforms that could be adopted by BPA relatively easily and in the short term, such as revising overly-conservative modeling assumptions, that could permit BPA's considerable stock of unused transmission capacity to be used more efficiently while lowering barriers to entry.
- Tyler H. Norris, *Beyond FERC Order No. 2023: Considerations on Deep Interconnection Reform,* Nicholas Institute for Energy, Environment & Sustainability,

Duke University (August 2023) (available at: https://nicholasinstitute.duke.edu/publications/beyond-ferc-order-2023-considerations-deep-interconnection-reform). This study provides a detailed analysis of the "connect and manage" approach to transmission interconnection employed by ERCOT, which has resulted in a much faster interconnection process as well as interconnection of considerably more capacity than in BPA or other ISOs/RTOs. BPA must study connect-and-manage and other systems used in ISOs and RTOs across the world to identify the most effective strategies that have already been proven to be effective.

Sincerely yours,

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Attorney for PRITCA