

August 15, 2025

Via email:
techforum@bpa.gov

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: Puget Sound Energy's Comments Relating to Bonneville Power Administration's Grid Access Transformation Initiative – July 28 and 29, 2025 Workshop

Puget Sound Energy (PSE) appreciates the opportunity to submit these comments in response to the Bonneville Power Administration's (BPA) July 28 and 29, 2025 Grid Access Transformation (GAT) Workshop.

Readiness Criteria

BPA proposes that it will require customers complete Phase 2 of a generation interconnection study to meet the new Readiness Criteria (GAT Preliminary Draft Language document, p. 5). Please provide examples and/or flow charts of the BPA Interconnection Processes and how the different study timelines correspond to "Phase 2."

Long-term Firm Queue Management (LTFQ)

As it relates to the LTFQ Management timeline on Slide 25 of the workshop presentation, PSE is seeking clarification on Steps 1 to 3 and how those relate to the application of capacity from Evolving Grid Projects (EGPs) 1.0 and 2.0. It appears that BPA will wait until Step 3 to apply EGPs' future capacity to transmission service requests (TSRs) that have committed to Interim Service by executing service agreements and posting of financial security in Step 2. PSE requests that BPA confirm this understanding is accurate. If so, BPA should discuss its planned tools and metrics for managing its transmission system. BPA should also describe how it will ensure current service would not be degraded with the addition of Interim Service capacity that has not yet been studied.

With respect to BPA's MIDC changes for service to MIDC, PSE is supportive of BPA's planned treatment of previously studied TSRs with a point of receipt (POR) of MIDCREMOTE or NWHUB. PSE supports BPA's proposal to have previously studied TSRs with a POR of NWHUB or MIDCREMOTE receive an award of long-term firm transmission after the completion of identified plans of service, and that these previously studied TSRs would not be limited to a reassessment Conditional Firm (CF) award. In addition, PSE would support allowing customers with TSRs having a point of delivery (POD) of MIDCREMOTE to conform their TSRs

to NWHUB. Lastly, PSE would support allowing the same customers to receive an offer of Interim Service if they meet the Readiness Criteria.

In addition to the above changes to MIDC policy, PSE recommends that BPA consider allowing existing BPA transmission customers to use their long-term firm point-to-point (PTP) transmission with a MIDREMOTE or NWHUB POR to schedule projects interconnected at BPA substations at MIDC. For example, a customer with an existing transmission contract that has a Vantage 230kV Source should be allowed to schedule a generation project that is interconnecting at the BPA Vantage 230kV substation.

BPA has also acknowledged that coordination of timelines with regional load-serving entities' Request for Proposals (RFPs) is needed to provide an effective and timely processing of the long-term firm (LTF) queue. It will be important that our organizations coordinate directly on these timelines to preserve access to BPA transmission service for bidders into our next RFP.

PSE is also seeking confirmation on future financial security commitments of customers who take Interim Service. It is our understanding that customers are obligated to provide financial security for five years of transmission service when an Interim Service agreement is returned. We further understand that customers would not have a subsequent obligation to provide additional financial security for future plans of service to firm up the Interim Service into long-term firm transmission.

Lastly, PSE agrees with other customers that a fifteen-day window to provide financial security is insufficient and we recommend a minimum of thirty days.

Interim Service

With respect to BPA's proposed Interim Service Principles, on slide 29 of its workshop materials, BPA proposes to have acceptable and manageable congestion, to preserve existing transmission rights, and preserve the quality of service for existing transmission rights holders. PSE is seeking clarification on what is meant by "acceptable and manageable congestion." In prior GAT meetings, BPA reported a 0.5% curtailment rate over a five year period. Will BPA have a targeted percentage of annual curtailment after new awards of interim service, and if so, what would will the target be? In addition, what are the tools that BPA would use to manage a more congested system and how would the new Interim Service transmission be managed differently than current long-term bridge Conditional Firm service? PSE requests that BPA, at a future GAT workshop, provide further information and details on the approaches and risks to managing a more congested transmission system.

PSE submitted prior comments regarding the treatment of subgrid conditions. In addition to those previously submitted comments, we are seeking clarification of a contingent agreement that BPA proposes in e(ii) on page 13 of the GAT Preliminary Draft Language document. Item e(ii) notes that a contingent agreement may be offered in a case where a subgrid project may be required to offer PTP interim service. What is a contingent agreement and the conditions of such an agreement? In addition, what is the proposed process to offer a contingent agreement to a customer that specifically requires the proposed Schultz-Olympia subgrid project for service?

BPA previously proposed that deferrals would not be allowed with Interim Service. Per our previous comments, PSE recommends allowing for deferrals for start of service. This would be particularly helpful for projects that have not yet started construction and would not be using the Interim Service until the project is placed into service. We recommend a standard five deferrals for the start of Interim Service, especially given that BPA has already secured financial security from the customer.

PSE appreciates the opportunity to comment and looks forward to more in-depth discussions on this topic.

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