

August 15, 2025

RE: Bonneville's Grid Access Transformation (GAT) Workshops – July 29-30, 2025

Powerex appreciates Bonneville's commitment to enhancing its ability to provide transmission service, even as the Northwest grid rapidly evolves and Bonneville experiences significant growth in demand for new transmission service. Powerex supports Bonneville's goals of accelerating the processing of a large and growing number of transmission service requests and seeking opportunities to make transmission service available to customers in a timely manner.

Continued Stakeholder Engagement Will Enable Durable Solutions

The GAT initiative is a significant undertaking for Bonneville and its customers that will only be successful through ongoing and iterative dialogue with transmission customers and other stakeholders. The stakeholder workshops held so far have been a good first step in that process. By participating in the workshops, Powerex was better able to understand the challenges facing Bonneville and to begin to consider potential solutions. Powerex commends Bonneville staff for their collaborative approach and encourages additional customer engagement.

While Powerex supports moving quickly, several of the potential solutions would have significant implications for Bonneville and its customers and, therefore, warrant sufficient time for careful evaluation and refinement. Powerex believes an iterative process with multiple opportunities for stakeholder engagement as proposals evolve is essential to achieve Bonneville's goals, while avoiding unintended consequences. Additional workshops, for example, will help stakeholders meaningfully evaluate and provide feedback on the proposed options, while advancing the shared goal of achieving workable and durable solutions.

Accelerating Queue Processing

Powerex generally supports Bonneville's objective of more quickly evaluating requests for transmission service. As Bonneville considers how to accelerate timelines for processing the queue, including establishing readiness criteria, it should ensure that those approaches enable all legitimate transmission service requests to be evaluated in a non-discriminatory manner. Potential solutions should reflect the wide and varied use of the Bonneville transmission system, including: (i) NT and PTP transmission service used to deliver generation to load both within BPA's territory and outside of it; (ii) wheel-through transmission service used to deliver energy to and from other regions (often as one segment of a longer path); and, (iii) transmission used to support delivery of energy to support regional programs and organized markets. This will ensure that future processes will continue to be consistent with Bonneville's long-standing commitment to open access and to providing non-discriminatory transmission service.

Meeting the Growing Demand for Transmission Service

Powerex understands that Bonneville is considering developing new variations of yearly transmission service that may be granted without the same studies and evaluation of ATC that occur when evaluating requests for its existing long-term firm and conditional firm transmission products. Powerex recognizes that Bonneville is facing growing demand for transmission service and supports Bonneville's goal of providing service to its customers to the extent possible. That said, Powerex believes that a workable solution must preserve the value of Bonneville's existing transmission products, including firm and conditional firm service. Powerex believes this can only be achieved by carefully considering the appropriate physical priorities to assign to each of its current and potential product offerings, and by ensuring appropriate financial outcomes (including outcomes associated with Markets+ congestion rent) for each product type. Powerex looks forward to further discussion of these details.



Powerex values the opportunity to participate in this process and urges Bonneville to continue robust stakeholder engagement before deciding on specific proposals and finalizing the details. We look forward to further discussions with Bonneville and other stakeholders.

Sincerely,

Raj Hundal

Director, Market Policy and Practices