

To: techforum@bpa.gov

Subject: Grid Access Transformation

Respondent: Dr. Terri L. Stewart (PhD Chemical Engineer)

The following comments are in response to the August 19, 2026, Workshop on the Grid Access Transformation (GAT) Program.

Comments on Dispatchable/Interruptible load

As part of the Rapid-Access Products and Interconnection Delivery (RAPID) program, BPA is evaluating a dispatchable/interruptible load product. This effort represents an evaluation of the feasibility of using large dispatchable loads during system events and curtailments, i.e., demand flexibility for large loads, including hyperscale data centers.

- I support the concept of demand flexibility for data centers that protects people and non-causing ratepayers during stress to the grid.
- I support using enforceable service agreements so that participating large loads can be curtailed under defined reliability conditions before involuntary shedding of firm retail load, including households and small businesses.
- I would ask BPA to make eligibility for RAPID or other accelerated/interim service conditional upon enforceable dispatchability or curtailment provisions.

Comments on Co-located or Behind-the-Meter Generation

BPA is evaluating other fast-track approaches under RAPID, including co-location and behind-the-meter generation configurations.

- I am concerned about the environmental and community consequences of using co-located or behind-the-meter generation as a means of providing temporary speed to power.
- BPA's August 19 materials do not identify what generation technologies or fuels would qualify for co-location or behind-the-meter fast track service.
- Unless BPA expressly limits eligible generation technologies or resources, these approaches could potentially include fossil-fueled generation.
- If fossil-fueled generation was permitted as routine primary or bridging power, surrounding communities could be exposed to sustained generator operation for months or potentially years, rather than the limited operations associated with true emergency backup generation.

A key question is “Will BPA permit routine fossil-fueled generation to qualify a large load for accelerated or interim grid access under RAPID?”

- I support limiting fossil-fueled generators associated with accelerated large-load interconnection to genuine emergency-backup functions.
- I support requiring compliance with all applicable federal, state, and local air-quality permits. Washington regulations distinguish emergency generators from sources of routine primary power; emergency-generator rules do not provide blanket authorization for sustained non-emergency operation.
- I encourage BPA to prioritize battery storage, non-emitting and renewable generation, demand-management software, and other technologies that provide genuine demand flexibility while remaining consistent with Washington’s Clean Energy Transformation Act (CETA).

Comments on Rate Payer Protection

BPA has stated that rapid load growth “must not financially burden existing, non-causing rate payers” and that BPA intends to “enforce strict cost causation.”

- I strongly support this principle and urge BPA to incorporate it into permanent, enforceable tariff, rate, contract, financial-security, and business-practice provisions.

BPA reinforced this principle in its August 31, 2026 Strategic Plan, which commits to financial structures and policy frameworks intended to ensure that “growth pays for growth” and to shield existing customers from the cost of large-load expansion.

I offer the following recommendations:

- Preserve the Northwest Power Act’s statutory protections for the existing preference customers and general requirements load, including the statutory exclusion of New Large Single Loads (NLSLs) from the “general requirements,” so that the costs of serving NLSLs, including hyperscale data centers, are not shifted into rates intended to serve existing general requirements customers.
- Continue to enforce the Northwest Power Act’s separate treatment of New Large Single Loads, which can include qualifying data centers. Utilities serving an NLSL or large data center should continue either to obtain BPA power for that load at the applicable New Resource Firm rate or to service it with nonfederal resources. For NLSLs including large data centers located in Washington, the serving electric utility must also comply with applicable requirements of Washington’s Clean Energy Act requirements.

- Continue to apply the New Resource Firm (NR) rate to BPA power sold to serve an NLSL, rather than allowing those loads to receive the lower-cost power rate applicable to general requirements.
- Adopt and enforce strict cost-causation requirements so that hyperscale data centers and other NLSLs bear the incremental costs they cause.
- Within BPA's jurisdiction, this should include applicable generation or power-supply costs, transmission expansion, interconnection, system upgrades, financing and other directly attributable costs.
- BPA should also structure its requirements so that costs incurred by local utilities to accommodate these loads are not shifted back to existing customers.
- *Adopt and publish clear, objective and enforceable criteria for determining when the costs of a transmission expansion principally caused by a specific customer or group of customers may appropriately be treated as providing broader regional benefits and allocated more broadly.*
- *BPA should disclose how that determination affects cost allocation, customer financial-security requirements and stranded-cost exposure and should not classify an expansion as regionally needed merely because doing so permits costs caused principally by one or a few large loads to be spread across the broader ratepayer base.*
- *Establish permanent, enforceable tariff and financial-security provisions ensuring that costs attributable to an NLSL, including hyperscale data centers, are not transferred to existing, non-causing customers if the project is cancelled, delayed, materially downsized, fails to take service, or terminates service before the infrastructure built for it has been fully paid for.*

Comments on Changing Queue Priority to Readiness Based Prioritization

Through BPA's Grid Access Transformation (GAT) initiative, BPA is evaluating changes to Commercial Transmission Planning that would move away from strict first-come, first-served queue priority and instead prioritize requests based on demonstrated commercial, financial, and technical readiness. BPA has stated that speculative and immature projects are clogging the transmission request queue and preventing projects ready to take service from securing capacity. Separately, BPA's RAPID program is evaluating fast-track interconnection products and other means of providing "speed to power" for large loads.

- I support readiness-based prioritization as a means of reducing speculative requests and protecting transmission capacity for projects that are demonstrably prepared to proceed.

I recommend that BPA adopt the following priority framework when scarce transmission capacity must be allocated:

Priority 1 – Existing residential, commercial, and industrial customers that are not causing the new transmission requirement.

Priority 2 - Data centers and other new large loads demonstrating both high probability and documented readiness.

Priority 3 – Speculative or insufficiently developed new large loads, including hyperscale data centers.

I recommend that Priority 3 not be included in the Agency Load Forecast for that year and not be permitted to encumber scarce transmission capacity until they demonstrate sufficient probability and readiness.

Don't allow speculative loads to reserve real transmission capacity.

BPA's published probability assessment considers, among other factors, clear ownership and financial backing; control of the site; permitting status; local utility and BPA transmission capacity; interconnection study status; resources identified to serve the load; necessary non-electrical infrastructure; environmental and regulatory requirements; the reasonableness of the proposed magnitude and timeline; prior forecasting accuracy; and projected energy and peak demand.

With respect to Priority 2, in addition to the factors BPA uses in assessing whether a forecast load has sufficient probability or certainty, including its 70% probability threshold⁽¹⁾, I recommend the following additional readiness criteria. These additional criteria help ensure transparency to the public, experienced design and construction of the facility are used, and financial security for the life cycle to protect the public is in place. The goal is to ensure maximum value for scarce transmission resources. This additional information includes:

- A defined mission that has been publicly disclosed,
- An owner/operator that is specifying design requirements (not a developer with no owner/operator identified),
- Has secured a qualified engineering and design firm that has built hyperscale data centers,
- A documented commitment to financial security and stranded asset protection,
- Developed a decommissioning plan and site restoration plan with secured funds set aside upfront that protects ratepayers from stranded assets.
- Demonstrated how they will meet required environmental laws and climate goals.

Thank you for this opportunity to comment on GAT and RAPID. I am commenting as a member of the public. I hope you find the comments helpful. If you have questions, please let me know.

Sincerely,

Dr. Terri L. Stewart

PhD Chemical Engineer

Resident of Richland, WA

⁽¹⁾ Examples of factors BPA currently considers in assessing load probability and readiness include:

- Does the project have real financial backing?
- Does it control the site – owned, leased, optioned?
- Is the company shopping multiple jurisdictions?
- Have permits been submitted or approved?
- Does local electrical infrastructure exist?
- Does BPA capacity exist?
- Has line/load interconnection study been requested?
- Have resources been identified to serve the forecast load?
- Does the necessary non-electrical infrastructure such as roads and sewer exist?
- What is the environmental review or other regulatory prerequisites and their timelines?
- Is the proposed magnitude and schedule reasonable?
- Does the customer have a history of accurately forecasting loads?
- Is there supporting documentation for operational changes?
- What are the proposed energy and peak demand amounts?