

July 21, 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 9, 2025 Workshop

Puget Sound Energy (PSE) appreciates the opportunity to submit these comments in response to the Bonneville Power Administration's (BPA) July 9, 2025 Grid Access Transformation Workshop. PSE supports efforts by BPA to meet the needs of the region, streamline its services, and embrace principles for efficiency while creating a bridge for its point-to-point customers to a future state. PSE is BPA's largest transmission customer, and has a significant interest in this initiative.

With respect to BPA's proposed readiness criteria, on slide 48 of its July 9 workshop materials, BPA proposes its foundational concepts for readiness and says that for any relevant generation or line/load interconnection, the electrical plan of service must be defined by the relevant transmission provider and construction contract for the project (if needed) signed and funded. PSE seeks clarification on how BPA defines a "construction contract". Does BPA's definition include contracts other than an executed and funded Large Generator Interconnection Agreement (LGIA)?

Additionally, among the concepts, BPA says that sub-grid constraints would need to be addressed to meet the readiness criteria. The Puget Sound region has a sub-grid limitation that has a plan of service that is projected to go into service in 2035 (Schultz-Olympia). PSE seeks clarification on how BPA would manage the award of interim service for transmission service requests delivering to Puget Sound customers before the Schultz-Olympia upgrade has been completed.

Lastly, with respect to BPA's proposal for its long-term firm queue management, in order to provide the transitional element of BPA's larger proposal to move to a future state, it will be critical for BPA to consider the utilities' near term resource acquisition needs. To that end, PSE requests BPA provide assurance that it will coordinate its process with the near-term (next two years) request for proposal timelines of load serving entities so those are be considered in the processing of the long-term firm queue.

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

cc: Adelle Harris, alharris@bpa.gov