

April 28, 2026

BONNEVILLE POWER ADMINISTRATION
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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments concerning BPA April 15th GAT Workshop

Seattle City Light (City Light) appreciates Bonneville Power Administration (BPA) engagement with customers regarding BPA's Grid Access Transformation. Please accept the following comments.

General Comments:

BPA failing to commit to study of 100kV transmission equipment in proactive planning studies:

Defining Bulk Electric System equipment as 100kV and above for study and operational regulatory purposes has been the industry standard for over 20 years. BPA is subject to the same North American Electric Reliability Corporation (NERC) Standards concerning transmission planning and transmission operations as all other entities that own and operate Bulk Electric System facilities in the United States. City Light request BPA include these reliability study requirements in their expansion planning.

City Light requests BPA recognize that transmission constraints on 100kV facilities do limit the amount of actual power flow that can be commercially scheduled and reliably supported. Conducting studies that fail to address sub-grid constraints does not result in least cost-least regrets transmission expansion projects that address both the need for regional transfer capacity and customer load growth. City Light believes the March 5th North of Pearl curtailment event is a result of BPA not including the Portland 100kV sub grid in its transmission planning studies.

City Light suggests that 100kV constraints in both the Puget Sound and Portland areas need to be included in transmission planning studies so that least regret projects can be proposed that support the needed commercial transmission capacity.

Probabilistic Analysis

City Light recommends BPA consider using an outside entity to conduct a probabilistic, risk based 10- and 20-year transmission needs assessment of the BPA transmission system. City Light has growing transmission needs and believes probabilistic transmission planning is crucial for building a resilient, cost-effective power grid by modeling for uncertainty and risks. City Light additionally believes there would be value in both a fresh perspective and confirmation of planned projects for the region. City

Light recommends BPA consider national leading entities such as Pacific Northwest National Laboratory (PNNL) and Electric Power Research Institute (EPRI) in this selection.

Proactive Planning:

City Light supports BPA's plan to integrate meaningful stakeholder engagement regarding updating data and planned projects for modeling.

City Light supports BPA establishing a repeatable planning cycle that integrates stakeholder engagement, results in least regrets projects, and is guided by a transparent expansion process.

City Light suggests that BPA consider that both the 10-year and 20-year study processes need to include scenario analysis. City Light recommends that at a minimum, the 10-year study includes a Heat Dome and a Polar Vortex extreme weather scenario. As a BPA customer, City Light expects that the BPA transmission system is designed to perform to a high level of reliability in these events.

City Light thanks BPA for accepting and considering these comments.

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cc: Melanie Jackson, Bonneville Power Administration