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Submitted via BPA's Tech Forum ([techforum@bpa.gov](mailto:techforum@bpa.gov))

## Comments Concerning Grid Access Transformation Future State

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

### **General Comments:**

City Light thanks BPA for rising to the challenge. The goal of reforming BPA transmission processes to allow for awarding firm transmission service to requestors in 5-6 years is worth the struggle and work. Thank you.

City Light encourages BPA to continue to focus on being able to award firm service within five to six years from the initial transmission request as a north star for the Grid Access Transformation.

Due to the disruptive nature of Grid Access Transformation, City Light suggest BPA open a conversion window for transmission products for the time it takes to reach the full future state. Customers have varied needs and positions that will need to be reevaluated in the new paradigm.

### **Proactive Planning**

Objectives – City Light supports BPA shifting to a model that anticipates transmission needs and uses scenario-based, probabilistic modeling and analysis.

Principles – City Light supports BPA's Proactive Planning principles and suggests BPA emphasize identifying projects of "Least Regret."

City Light recommends BPA be transparent and collaborative regarding scenario development and progress toward completing the first iteration of planning analysis within two years.

City Light request BPA include 100kV and above transmission facilities in the Puget Sound Region in their planning models.

### **Accelerate Expansion**

Objective – City Light supports BPA's vision of energizing new facilities in 5-6 years from request to service.

City Light request BPA update customers on the progress to enabling this capability in the Quarterly Business Review meetings.

Focus Areas – City Light thanks BPA for focusing on mechanisms for customers to build BPA network assets.

### **Interim Service**

Objective – City Light supports BPA providing Interim service rather than waiting for full energization of supporting transmission projects. City Light additionally is in favor of a solution enabling the agency to offer structured, risk-managed service earlier, using existing tariff products like Conditional Firm (CF) or 6NN to bridge the gap between request for service and long-term firm service.

Principles – City Light supports BPA's principles for interim service including preserving the quality of service for existing **firm** transmission rights holders.

City Light asks BPA implement interim service as soon as possible. Some version of a cluster study to enable designating projects for a particular service request is just repeating the current BPA TSEP process. BPA could include language supporting future study costs and requirements in the interim service contracts. The outcome of readiness requirements alone will likely not yield a queue that is small enough to study effectively. City Light believes requiring requestors to take interim service with a – multi-year service deposit will result in only mature, long-term transmission requests remaining to be studied.

### **Interim Service Options for offers of Transmission**

City Light recommends BPA implement interim service at a NERC Priority 6 (CF,6NN). The benefits of providing interim service are greater than the risk of degrading existing priority 6 service.

### **Interim Service What to Expect**

City Light supports BPA exploring limitations on Extensions for Commencement of Service Rights for interim service. Extensions requested due to delays in Generator Interconnection should be allowed. City Light appreciates BPA preventing new interim service from negatively affecting NWACI ownership and encourages BPA to have a NWACI customer meeting to discuss this issue.

Seattle City Light thanks BPA for its effort and dedication to meeting customer transmission needs and for considering these comments.

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cc: Melanie Jackson, Bonneville Power Administration