

September 9th, 2026

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

Comments concerning BPA August 19th Grid Access Transformation (GAT) Future State Workshop

Seattle City Light (City Light) appreciates the opportunity to provide comments on Bonneville Power Administration's (BPA) August 19th GAT Future State Workshop. We value BPA's engagement with customers and offer the following recommendations to support a more reliable, transparent, and forward-looking transmission planning process.

Requested Feedback

Commercial Transmission Planning:

Q: Which of these problems and/or goals as stated in the presentation are most important to you?

A: City Light suggests solving one problem or achieving one goal will not materially change the situation. In general, City Light believes the principle of "Business Model Supports Regional Goals" should be seen as a guidepost. City Light supports all the stated Initiative Goals and believes achieving them together is the sweet spot for execution.

Q: Are there other significant problems and/or goals we may have missed?

A: City Light suggests that commercial transmission planning needs to result in transmission expansion projects being completed and firm long-term service being awarded in a timely manner. See comments below for further discussion.

RAPID:

Q: Interconnection Needs: Where do today's Line & Load Interconnection (LLI) processes slow you down?

A: City Light is not currently affected by the LLI process.

Q: Co-location: Appetite in this temporary interconnection service to fast track and non-firm service?

A: City Light supports BPA adopting fast track interconnection practices that follow strict cost causation principles and ensure grid reliability. City Light suggests that BPA owned and remotely operated points of separation be mandatory for temporary interconnections that may need to be curtailed.

Q: Product design: Which fast-track paths – co-location, Behind The Meter (BTM), dispatchable – fit your projects?

A: City Light has growing needs for new resources. Any RAPID initiative that accelerates the ability of new resources to interconnect is of special interest.

Planning Process and Definitions

Terms and Context

City Light recommend BPA change the definition of Transmission Subgrid as follows:

Subgrid: Any facilities on the interconnected transmission system that

- do not, by themselves, make up one of the monitored Constraints (e.g., lines, transformers, or substations); and
- Are not part of a Total Transfer Capability (TTC) path definition between an entity and BPA (independent of whether BPA uses that TTC in their practices, and
- Are not the TTC limiting facility or facilities under N-1 conditions for any Flowgate, Path, or TTC between any entity and BPA; and
- And are not listed in the BPA Outage Policy Appendix as facilities that BPA requires outage coordination.

BPA Planning and Obligations

Potential Build Options - City Light requests BPA consider the uncertainty and risk involved with couching the GERP projects as "*Potential Build Options*." Multiple year reliability studies, multiple regional coordination studies, and the WestTEC 1.0 studies are relying on those projects being energized by 2035. We support BPA being flexible with changing needs and better least regrets projects. City Light request BPA considers that most of the GERP projects are BPA main grid upgrades needed for the long-term load service reliability of BPA customers.

BPA Planning Study Matrix

City Light recommends that BPA take a step back and consider that it is not simplifying or streamlining transmission planning by adding new siloed study processes.

City Light recommends BPA consider consolidating Generator Interconnection, Line & Load Interconnection, Expansion Planning, and Commercial Planning into one study process taking all these network transmission needs into account holistically.

- Doing this study with 100kV and above granularity would assure all customers that BPA is adequately planning for the transmission necessary to serve their growing load service needs.
- Doing this study with 100kV and above granularity with stability analysis would reduce the Attachment K and NERC TPL Reliability study work to a limited check study and documentation process.



- This process would move documenting the plan of service and related contracts for commercial requests to an administrative process. This would include the plan of service for network transmission for new Transmission Service Request, needed network upgrades for Generator Interconnection Requests, and needed network upgrades for Line & Load Interconnection requests. This would additionally provide transparency to customers regarding assigning cost for needed network transmission expansion.
- This change could be designed and implemented through TC-29 while the Transition Generator Interconnection cluster study and CFS Transition Study are completed.

Expansion Planning

City Light thanks BPA for providing an opportunity to update topology, generation, and load assumptions for ongoing transmission expansion planning activities.

City Light looks forward to the next workshop with the ongoing engagement with BPA on the Baseline/Scenario Study Plan.

Commercial Planning

Components of the Opportunity

City Light strongly supports the following proposed Opportunity principles

- Prioritize Readiness Over Strict Adherence to Queue Priority
- Integrate Planning Queues/Studies to the Degree Possible
- Align Financial Standards to Commercial Transmission Risk
- Business Model Supports Regional Goals

City Light suggests that the Opportunity goal, *Mitigate Planning Impact of LSE Minimum Bid Requirement(s)*, is treating the symptom instead of the root cause. New resources making multiple new transmission requests to deliver their power is rational market activity. The issue of LSE's requiring and/or preferring new resources that have or have requests for firm long-term transmission is caused by BPA's lack of ability to address transmission needs in a timely manner. BPA's goal for a 5–6-year, end to end process of supplying requested transmission capacity is the solution to this issue. City Light has the following additional observations on this issue:

- LSEs prefer firm long-term transmission service to deliver resources to load in a reliable manner
- Some LSEs have State regulatory requirements regarding transmission to serve load.
- Resource developers want to have the largest pool of off-takers as possible
- Resources in modern market construct need to be able to deliver nameplate power to multiple locations and not be limited

- If requested and paid for using cost causation principles, BPA needs to supply the transmission capacity for these needs in a timely manner.
- To change this paradigm, BPA needs to provide investment level certainly to both LSE's and Resource developers that needed transmission capacity will be available in 5-6 years of requests.

Opportunity Initiative Goals

City Light agrees with the stated BPA opportunity initiative goals and suggests that they are a necessarily cohesive package. Accomplishing one or two of the goals alone will not help BPA meet customer needs.

Delay

SCL shares Portland General Electric's concerns regarding a timeline for reform and future studies. SCL requests BPA share a timeline, milestones and a plan for implementation of Proactive Planning in the autumn GAT workshop. Specifically, SCL requests clarity on when the first Commercial Planning Study will be completed and how frequently BPA plans to conduct such studies into the future.

Mild or Wild?

City Light suggest BPA be wild with their plans to reform commercial transmission planning. Over two years ago, BPA promised customers "transformative change" in how it approached transmission planning. While BPA has proposed some innovative changes, we suggest BPA consider consolidating siloed study processes and changes to the underlining dynamics of path scheduling.

City Light suggests BPA consider that it has all the underlying data necessary to move to a Power Transfer Distribution Flow (PTDF) based model for commercial transmission rights ownership, scheduling, and cost recovery. This shift would align BPA for the future and provide a structure to incentivize market driven, non-BPA development of transmission capacity. City Light recommend BPA work with the other major Transmission Service Providers (TSPs) in the West on a plan for West wide implementation.

City Light understands that BPA is facing tremendous opposition from customers that are either not experiencing load growth or are well positioned currently. City Light thanks BPA for recognizing the need for change and for working toward meeting customers' needs in a timely manner.

Accelerate Expansion

City Light thanks BPA for completing the Transmission Infrastructure Delivery and Execution Strategy (TIDES) process for procurement of scoping/design/build services. We are hopeful that through careful contract management by BPA that project execution time and costs will be reduced.

Customer Build Option

City Light requests BPA invest significant resources into accelerating the process to implement a Customer Build Option. City Light does not believe that any other process needs to be concluded prior to BPA moving forward with Customer workshops to inform Business Practice development. BPA



currently hands off scoping/design/construction and even owner contract management to consulting engineering firms. Allowing customers to act in the same manner as those consulting engineer firms is not a significantly different process.

Rapid Access Products & Interconnection Delivery (RAPID)

City Light thanks BPA for considering a gap program to rapidly address customer needs.

City Light supports the RAPID objectives of deploying fast-track products and services, enforcing strict cost causation, and looking beyond the traditional TSR model.

City Light suggests that BPA consider the advantages of new products for delivery of both Tier 1 and Tier 2 power in the RAPID process.

Grid Enhancement Reinforcement Portfolio (GERP) Update

City Light appreciates BPA providing an update on both the timeline and estimated costs of GERP 1.0 and 2.0 projects.

City Light requests BPA apply the resources necessary to complete the proposed Cross Cascades North upgrade projects on time. City Light would be open to BPA reassessing these projects and proposing a different mix of projects that better serves long-term needs in a least regrets way.

City Light thanks BPA for accepting and considering these comments.

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cc: Melanie Jackson, Bonneville Power Administration