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

SENA comments on BPA Grid Access Transformation

Shell Energy North America US, L.P. (SENA) commends the work that BPA is doing to reform the transmission service request work and appreciates the opportunity to submit informal feedback ahead of the July 29/30 workshops. As a non-utility merchant transmission customer, SENA's business model is fundamentally different from a large portion of BPA's customer base as it relies on buying and selling energy across the Northwest. SENA believes it is vital that fair access to the transmission system be a core consideration in the reform effort and that consideration is given to all use cases of the transmission system during the policy development process.

Business Readiness Criteria Requirements

SENA is supportive of more stringent eligibility requirements for Transmission Service Requests (TSRs) based on commercial maturity and feasibility as a means of reducing the volume of speculative "shotgun" transmission service requests in the queue, but find that requiring a finalized Power Purchase Agreement (PPA) as a condition for TSR study or eligibility would create a fundamental timing conflict with existing utility procurement practices in the region, where Requests For Proposals (RFPs) typically require transmission service to be in place before a project can bid. This creates a circular dependency for entities who must secure transmission service to compete in RFPs yet would be unable to do so without a PPA. This requirement would effectively invert the established procurement sequence, exclude viable market participants and disadvantage non-utility competition. SENA urges BPA to ensure continued access to transmission access for merchant entities that may not own generation or load but facilitate energy delivery between third parties. The new rules should accommodate diverse business models which may not necessarily have a single dedicated generator or bilateral contract at the time of TSR submission.

To complement BPA's readiness criteria and further deter speculative "shotgun" TSR submittal, SENA recommends that BPA consider establishing optional readiness pathways that allow entities to demonstrate commercial seriousness through financial commitment alone. Specifically, BPA could permit entities without a PPA or interconnection agreement to satisfy readiness requirements by posting a letter of credit, cash deposit, or other acceptable financial security. This approach may provide an indication of market intent by using financial backing as a proxy for commercial maturity.

Additionally, SENA suggests that BPA consider higher financial commitments to accompany TSR submissions. Increasing the cost to submit and hold a request may be an effective way to discourage “shotgun” submission strategies. SENA is supportive of a higher application deposit, perhaps with non-refundable portions, which may encourage a more deliberate approach to TSR submittal. As a part of this approach, BPA may consider a flat fee increase, or an escalated commitment based on the number of TSR submittals per customer.

Finally, there may be opportunities for BPA to identify duplicative, or similar TSRs at a customer level and enforce a limit on the number of submittals per customer/project within a certain window or necessitate the consolidation of multiple requests through the same flow gate.

Support for Alt3 – Removal of Mid-C Remote with Preserved Flexibility

SENA recognizes the complications associated with planning around virtual MidC Remote point and does not foresee losing any significant functionality in conforming MidC Remote requests to Northwest Market Hub (NWHUB). SENA incorporates the use of these hubs as a means of matching up supply plans to load customers without disrupting network requests that these customers have made and finds that this functionality provides the flexibility necessary to resolve the temporal mismatch between network load service and merchant supply plans. SENA is supportive of Alt3 provided that it is implemented as described and NWHUB remains available as a long-term point. Alternatively, SENA is also supportive of maintaining the status quo as outlined in Alt4 with the understanding that this approach, while not addressing the inherent complexities of the planning process, may be workable if combined with the appropriate business criteria.

Shell Energy North America thanks BPA for accepting and considering these comments.

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