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TACOMA PUBLIC UTILITIES

Sept 9, 2026

BONNEVILLE POWER ADMINISTRATION
PO BOX 14428
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Re: Comments concerning BPA August 19, 2026 Grid Access Transformation (GAT) Future State Workshop

Tacoma Power appreciates BPA's eagerness to engage stakeholders in the challenging process of identifying and implementing new procedures for expanding transmission access for customers. We look forward to continuing working with BPA on this effort. Below are comments from Tacoma Power following the second workshop on GAT, organized by topic.

Overall GAT Approach

We suggest BPA consider a more wholistic, outcomes-oriented approach to providing customers with Transmission access. We worry that introducing additional planning processes will increase the possibility of redundant work for BPA with overlapping analyses and also increases the probability of silos forming where information is either lost or conflicting between processes.

Instead, we suggest starting at the end and working backwards to identify a planning process to get you there. From our perspective, the end is something akin to "What information and/or commitments from customers does BPA need to be able to 1) award LTF transmission service, 2) proactively identify a needed transmission project, and 3) commit to building a transmission project?"

System Assessment

Reliability is the first and most important factor in considering necessary transmission upgrades. Tacoma Power would like the opportunity to better understand the inputs, assumptions and results from these studies to understand what is out of scope that could be addressed in the expansion planning process. Using this study as a starting point for expansion would also provide a bottom-up approach and more detailed system view, ensuring an expansion study is grounded in reliability needs.

Expansion Planning

We understand that the scope of this analysis is in an early phase and more detailed study plans will continue to be discussed with stakeholders in the future. At this stage, we have only one major recommendation. We strongly suggest that this analysis have granularity down to 100kV and include the subgrid. Without a complete picture of the needs of the transmission system, both BPA and its customers could end up spending money expanding a line that results in a "path to nowhere". This issue is further exacerbated by using the WestTEC study as a starting point for expansion, as Transmission with voltage ratings of 115kV were not included in that analysis.

Commercial Transmission Planning

We first want to emphasize that Tacoma Power does **not** want TC-27 to be a starting point for considering the future state of commercial transmission planning.

We are concerned that early ideas of how to implement goals of first-ready, first-serve, such as LSE Minimum Bid Requirement proposal, are attempting to apply evaluation criteria to transmission that belong in the generation and load interconnection process as defined today. We see this as a problem because such criteria 1) violates FERC open access principles for transmission 2) is redundant with reforms in the GI and LLIR processes and adds more work for BPA staff and 3) cannot be applied to transmission requests that wheel through BPA's balancing authority area, which accounts for a significant portion of transmission service requests. BPA can still achieve its goal of first-ready, first-serve by simply not allowing deferrals of transmission service.

Given this potential to conflate the three queue processes, Tacoma Power supports BPA's proposal to consider consolidating Generator Interconnection, Line & Load Interconnection, and Commercial Planning into one study process. We think this could even be taken a step further and include Transmission expansion as well. BPA can look to regional transmission organizations like SPP, that have also taken steps to consolidate their transmission planning processes.

However, in consolidation, we want to ensure that the BPA transmission needs of customers with their own balancing authority areas are not lost. Of the eight different transmission related studies shared on slide 6 of the GAT presentation, only one of those, the commercial planning process, captures the capacity needs of other transmission providers.

Finally, one of the goals listed was around financial risk standards. We suggest that the commercial planning team coordinate with the financial risk policy team that is planning to propose a revision to BPA's financial policy mid-October. This will provide a starting point for where BPA is heading in terms of debt vs revenue financing for large capital investments as well as how much of that revenue comes from rates or potentially other mechanisms such as this commercial transmission process.

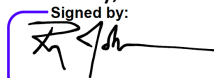
GERP

We appreciate the work that went into increasing the accessibility of information and status updates for the GERP projects.

Customer-build out

We appreciate this being a proposed new option and are pleased with the fast timeline BPA is aiming to create a process for customer-builds.

Sincerely,

Signed by:

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Ray Johnson

Deputy General Manager, Power Management

