

Steve Lincoln
Manager, Transmission
Email: steve_lincoln@transalta.com

July 21, 2025

TransAlta Comments on Grid Access Transformation Workshops July 9 and 10, 2025

Introduction

TransAlta's comments are in response to the Bonneville Power Administration's (BPA) stakeholder workshops held on July 9 and 10 about the proposed Grid Access Transformation Program.

TransAlta owns and operates generation in Washington state and transacts physical, and financial wholesale power across multiple markets including AESO, CAISO, Mid-C, DSW, SPP, PJM, MISO, ISO-NE, ERCOT, and NYISO, as well as trading in environmental markets across Canada and the U.S. In the Pacific Northwest, TransAlta utilizes an inventory of transmission rights for its energy marketing, asset development, and asset optimization activities, and so has a vested interest in BPA's paused transmission queue, transition activities to resume processing transmission service requests (TSR), and the proposed Six-Point Solution Framework leading to the future state.

The comments are organized in order of the workshops' presentation.

Proactive Planning

TransAlta supports proactive planning. We underscore that much more detail and regional engagement is needed to establish the "Key Expansion Drivers" and we contend that the effort should occur sooner than the five-year period suggested on slide 21. Specifically, TransAlta suggests that one driver must be Operationally Informed so today's problem flowgates are addressed (those that experience curtailments and hourly sales stoppages, for example).

Also on the presentation's slide 21, it is unclear what BPA means by running the "Request Informed process on a 2-3 years cycle". Is that on par with how frequently NITS forecasts will be evaluated?

Finally, we encourage BPA to recognize that expanding the transmission system cannot be perfect. To be truly proactive and keep pace with increasing needs, BPA

should err on the side of modest over-building of transmission capacity, which should generate less regret than allowing scarcity and firm transmission shortfalls to persist.

Accelerate Expansion

Given resource constraints mentioned at slide 26, TransAlta requests that BPA escalate the third area of focus, which is customer-built BPA network assets. Option-to-Build is a successful method utilized elsewhere in the country where Interconnection Customers build and transfer ownership of interconnection substations (Network Upgrades) to local Transmission Owners, who are equally concerned with ensuring safety and reliability as BPA. What prevents those established practices from being leveraged here?

Readiness Criteria

TransAlta opposes BPA's currently proposed readiness criteria, which is unduly focused on evidence of a power purchase agreement in one form or another, and which excludes entities who are willing and able to contract long-term firm service, such as for energy marketing purposes.

TransAlta recognizes that BPA is trying to reduce the transmission queue to make it more manageable. However, that goal does not justify such narrow criteria and excluding customers who are otherwise ready to take service. BPA must work with the region to include other forms of readiness, such as reasonable security or deposit requirements, and links to interconnection requests or service.

TransAlta is still considering BPA's questions regarding virtual points, because providing transmission service to and from the region's liquid hubs remains critically important. We tentatively support alternative 3 described on slide 51, but request that BPA revisit Northwest Market Hub (NWHUB) and MIDCRremote in a future workshop, and consider how centroid concepts (that might be applied to these virtual points) are modeled by BPA in other contexts.

Yours truly,

TransAlta

Steve Lincoln
Manager, Transmission