

**Grid Access Transformation (GAT) Future State Workshops
Summary of Written Comments Received and BPA Staff’s Responses**

Last Updated: August 4, 2026

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I. Comments Received in Response to the June 15, 2026 GAT Future State Workshop

The customer comments associated with these BPA responses can be found [here](#) under the Public Comments section.

#	Commenter	Summary of Comment/Question	BPA Response
1	NIPPC/RNW	In future expansion planning cycles, we recommend BPA consider developing and applying scenarios to the 10-year planning study; although even in scenarios that adjust multiple variables, load forecasts and generation locations are likely always to be the most significant elements.	BPA thanks both NIPPC and RNW for their comment. BPA's vision is to include scenarios in our 10 yr analysis when beneficial and if time permits in Phase 2 of Cycle 1. Should this analysis not occur in Cycle 1, our goal is to expand our process in Cycle 2.
2	NIPPC/RNW	We do recommend that the 10-year study include a sensitivity that explores load growth significantly higher than the forecast in the base case.	BPA thanks both NIPPC and RNW for their comment and will take a significantly higher load growth sensitivity into our 10-yr baseline analysis.
3	NIPPC/RNW	We also suggest that BPA provide stakeholders with more information on sensitivities for the 10-year study and the scenarios for the 20-year study at the next GAT update. We would like BPA to indicate how many sensitivities it will apply for the 10-year study and how many scenarios it will develop for the 20-year study.	BPA thanks both NIPPC and RNW for their comment. Though we will not be prepared to provide this level of detail on scenarios and sensitivities in our August workshop, BPA will be sharing more information of this nature in November.
4	NIPPC/RNW	For the 10-year study, BPA should be prepared to provide stakeholders with a recommendation for the number of sensitivities as well as recommendations of the sensitivities BPA believes will be most useful in achieving the goal of identifying least regrets transmission upgrades.	BPA thanks both NIPPC and RNW for their comment. Though we will not be prepared to provide this level of detail on scenarios and sensitivities in our August workshop, BPA will be sharing our recommendations on scenarios and sensitivities in November.
5	NIPPC/RNW	Stakeholders should have the opportunity to provide comment and advice on the sensitivities that BPA will apply to the initial 10-year study.	BPA thanks both NIPPC and RNW for their comment and will take a designated comment period on proposed 10-yr baseline sensitivities into consideration.

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6	NIPPC/RNW	BPA should also provide a specific timeline to develop scenarios for the 20-year study.	BPA thanks both NIPPC and RNW for their comment. BPA looks forward to presenting more detail on the scenario development process in our November workshop, including a proposed timeline.
7	NIPPC/RNW	We also recommend that BPA be more precise in identifying which stakeholders in the region should review the data BPA will use in these studies. In its presentation, BPA encouraged “customers” to request and review the load, generation, and transmission topology that BPA intends to use in these studies. Certainly, BPA’s network transmission service customers (most of whom are BPA’s power customers) should have an opportunity to review their load and resource forecasts (and modify them as appropriate). The request is more confusing, however, when considering BPA’s point to point transmission service customers.	BPA thanks both NIPPC and RNW for their comment. It is BPA's intention to encourage network customers to review their data for the expansion study.
8	PGE	PGE requests additional detail on: FERC Order 1920 Alignment	BPA thanks PGE for their comment. As BPA develops our Study Plan, with robust regional stakeholder engagement, BPA will discuss the alignment of the Expansion Study with FERC Order 1920.
9	PGE	PGE requests additional detail on: How IRPs, including CETA and HB 2021 drivers, will be reflected in Proactive Planning Expansion Studies.	BPA thanks PGE for their comment. As BPA develops our Study Plan and works with the region on scenario drivers we look forward to sharing our recommendations and participating in robust conversation on how the drivers will be reflected in studies. This discussion is planned to begin in the November 2026 time frame.
10	PGE	PGE understands BPA recorded the June 15th workshop but, as of June 29th, the recording has not yet been posted. PGE requests this recording be made available.	BPA thanks PGE for their comment. The recording has been posted and can be found here: https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project

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11	PGE	PGE requests additional detail on: Impacts from TC-27 Timeline	BPA appreciates PGE's request and understands that stakeholders would like clarity on the dependencies between Proactive Planning and the TC-27 proceedings. As TC-27 moves forward, BPA will be notifying it stakeholders when Proactive Planning timelines are affected by tariff proceedings.
12	PGE	Finally, PGE requests additional detail in the August workshop on "commerical planning" related to if/how capacity will be allocated to expansion planning study participants.	BPA thanks PGE or the comment and acknowledges this request. BPA will not have this level of detail on capacity allocation our August workshop, however, BPA is committed to public discussion on the topic as Commercial Planning is developed.
13	PGE	PGE requests additional detail on: Anticipated timelines associated with energization of the expansion projects that will be identified in these [Proactive Planning Expansion Initiative] studies.	BPA thanks PGE for their comment. As our Commercial Planning initiative advances, how it interfaces with the the Accelerated Expansion initiative will be developed and we can provide greater detail on anticipated timelines.
14	PGE	PGE also requests BPA provide additional detail in the August workshop on "product planning" related to if/how recent FERC "show cause" Orders may influence BPA's service offerings.	BPA thanks PGE for their response and is reviewing the order and other considerations as we look at future product planning offering. More will be discussed at the August Future State workshop.
15	PGE	PGE would appreciate a complete summary of all the "main grid" transmission infrastructure upgrades not associated with interconnection requests that are currently in development on the BPA system, including GERP, Attachment K, and TSEP "customer needed projects."	BPA thanks PGE for their comment, this request is under consideration.
16	PPC	PPC requests additional information on how customer input into this process [Expansion Study, Phase 2] will be considerend and weighed.	BPA thanks PPC for their comment. We will be looking to begin our conversation with customers on our Phase 2 study process in our November Proactive Planning workshop. At this workshop we plan to add detail on how customers will be involved in Phase 2 of the Expansion Study.

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17	PPC	PPC requests that BPA formally commit to scoping the Expansion Planning process to include facilities down to 100 kV. Verbal commitments to this effect are helpful, but a written commitment on this point is preferred.	BPA thanks PPC for their comment. Our vision to identify HOT projects is to be agnostic to voltage level. Transparent and objective criteria will be used to identify needs that signal High Opportunity Transmission projects. The level of detail in our 10 and 20 yr models will align with what is currently in WECC basecase which include 100 kV facilities and below.
18	PPC	As part of a HOT project policy, the agency should: Establish clear criteria for identifying HOT projects.	BPA thanks SCL for their comment and intends to work with customers to develop a criteria that is objective, clear, and transparent for High Opportunity Transmission (HOT) project identification.
19	PPC	As part of a HOT project policy, the agency should: Create a process that allows for customer input on HOT project designation.	BPA thanks PPC for their comment and intends to work with customers to develop a criteria that is objective, clear, and transparent for High Opportunity Transmission (HOT) project identification and to develop and continuing process to facilitate customer input.
20	PPC	As part of a HOT project policy, the agency should: Estimate expected rate impacts, share that analysis with customers, and use that information to inform whether a project receives a HOT project designation.	BPA appreciates PPC's comment and will take estimated rate impacts into consideration as we work with stakeholders to develop transparent and objective HOT project identification criteria.
21	PPC	As part of a HOT project policy, the agency should: Consider strategic value provided by identified projects at a quantitative or qualitative level.	BPA appreciates PPC's comment and will take strategic value and its measurement into consideration as we work with stakeholders to develop transparent and objective HOT project identification criteria
22	PPC	PPC would like to see the agency work towards a more holistic planning approach that can streamline the evaluation of interconnection (both line and load, and transmission needs in a more fulsome way.	BPA appreciates PPC's comment and their support of more fundamental reform. BPA is watching nationwide planning process consolidation efforts and is actively evaluating precedents that may be applicable to BPA's processes.

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23	PPC	PPC supports BPA benchmarking other transmission and interconnection planning approaches that are being adopted and reviewing recent FERC orders and rule makings to pursue a more holistic approach to transmission and interconnection planning. We request a timeline for these activities and a discussion with customers to develop a plan that balances the need for transformative change with the need to put something in place quickly so the BPA can resume commercial studies and identify HOT projects.	BPA appreciates PPC comment. BPA will be addressing some of the benchmarking activities underway and a program under GAT that addresses fast tracking large load interconnection at the August workshop.
24	PPC	The agency must build-in a robust customer engagement opportunity to develop the commercial planning process. It is vital that load serving entities have timely access to capacity to serve load. That should be BPA's number one goal in planning its transmission system.	BPA thanks PPC for their comment and agrees and is committed to robust customer engagement when developing the Commercial Planning process. When the effort kicks-off customers will be able to provide feedback on the initiative's principles, objectives, and goals.
25	PPC	PPC supports changes to BPA's planning process that would ensure those entities ready to take transmission service are able to receive such service.	BPA thanks PPC for their comment and agrees and is committed to robust customer engagement when developing the Commercial Planning process. When the effort kicks-off customers will be able to provide feedback on the initiative's principles, objectives, and goals.
26	PPC	PPC members continue to be supportive of BPA offering a customer build option as soon as possible – ideally by the end of 2026. As the agency has offered customer build opportunities in the past, it seems reasonable that BPA could explore potential pilot projects of its planned customer build policy by the end of the year. There are projects in the pipeline that PPC members are prepared to take on as self-build pilot projects and our members anxiously await that opportunity.	BPA appreciates PPC's support continued interest in the customer build option. We are committed to implementing the customer build option in 2027. As, implementation develops, we may consider pilots.
27	PPC	As BPA develops potential new transmission products the agency should prioritize creating flexible products that will work with regional programs like the Western Resource Adequacy Program (WRAP) and Markets+.	BPA thanks PPC for their comment and will take it into consideration.

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28	SCL	BPA should also be transparent about cost and schedule impacts on GERP projects, including the use of contractors in place of BPA staff.	BPA thanks SCL for their comment. BPA intends to share cost and schedule impacts on GERP projects as they arise. We are also currently evaluating where we can optimally leverage the use of contractors in place of BPA staff so that it can provide the most value and benefit.
29	SCL	BPA has acknowledged that its current planning approach is too reactive. City Light agrees and encourages BPA to integrate customer and market signals, such as Transmission Service Requests, into scenario and sensitivity design.	BPA thanks SCL for their comment. As BPA works with its stakeholders to develop its process for the design of scenarios and sensitivities, we look forward to the conversation about necessary drivers. We will take this suggestion into consideration.
30	SCL	Additional Value can be realized by establishing a transparent, collaborative framework for jointly developing scenarios in both Phase 1 and Phase 2 studies.	BPA thanks SCL for their comment. In order to meet the necessary timelines of this effort, BPA has chosen to adopt a more robust scenario development process for Phase 2. In this process, BPA will establish a transparent and collaborative process for developing scenarios for use in our 20 year analysis. It is a possibility, when beneficial, that BPA will introduce 10 yr scenario analysis in Phase 2 as well.
31	SCL	City Light requests BPA work jointly with customers to define objective, equitable criteria for High Opportunity Transmission (HOT) project identification.	BPA thanks SCL for their comment and intends to work with customers to develop a criteria that is objective, clear, and transparent for High Opportunity Transmission (HOT) project identification.
32	SCL	True transformation requires more than transparency into current practice; it requires consolidating siloed planning processes and shifting from deterministic to probabilistic methodologies.	BPA appreciates SCL's comment and their support of more fundamental reform. BPA is watching nationwide planning process consolidation efforts and is actively evaluating precedents that may be applicable to BPA's processes. BPA will take SCLs recommendation of probabilistic methodologies into consideration.

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33	SCL	City Light requests BPA commit to including all applicable Bulk Electric System-level equipment in Proactive Planning Studies.	BPA thanks SCL for their comment. Our vision to identify HOT projects is to be agnostic to voltage level. Transparent and objective criteria will be used to identify needs that signal High Opportunity Transmission projects. The level of detail in our 10 and 20 yr models will align with what is currently in WECC basecase which include 100 kV facilities and below.
34	SCL	City Light recommends BPA explore a dedicated product designed to reliably deliver Federal Power to Tier 1 and Tier 2 customers.	BPA thanks SCL for their comment. We believe we have products to reliably deliver Federal Power to Tier 1 and Tier 2 customers and ask that PPC elaborate on what they would like BPA to explore.