

February 25, 2024

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

Comments Concerning February 11th, 2025, Transmission Planning Reform Public Meeting

General Comments

Seattle City Light (SCL) supports BPA inviting customers to be part of the solution to the overwhelming challenge of responding to the volume of interconnection and transmission service requests. SCL encourages BPA to maintain focus on its mission to create and deliver the best value for customers while ensuring an adequate, efficient, economical and reliable power supply.

Context and Need for Change

SCL agrees with BPA's assessment of the increase in generator interconnection, line/load interconnection, and Transmission Service Requests (TSRs). These requests are predominantly due to customer needs. This increase is not just a Northwest phenomenon and is being addressed creatively in other regions with varying degrees of success.

SCL suggests that the Generator Interconnection Reform BPA implemented with customers during the TC-25 process has not yet had time to fully be implemented. This reform framework should be given time to produce results and lessons learned during the first non-transition cluster study before changing this newly reformed process. BPA and customers will benefit from the transition cluster study process being completed in an expeditious manner to facilitate the start of the first full generator interconnection cluster study under the new process.

SCL thanks BPA for acknowledging the need for change. The speed of industry changes and volume of requests call for new dynamic in transmission planning. The old paradigm of studying 100MW of nameplate capacity serving 100MW of load at discrete locations no longer matches our shared reality. It takes five to eight 100MW nameplate Variable carbon free resources with a 20% or less Qualifying Capacity Contribution (QCC) factor to reliably serve 100MW of load. This translates into 500MW to 800MW of TSRs to serve the same 100MW of load. The current approach to transmission planning is not effectively meeting these needs.

SCL recognizes that change is challenging at best, includes tremendous disagreement, and is necessary. SCL suggests BPA request customers dedicate staff to participate actively in the reform process from the first meeting. SCL additionally suggests BPA consider rapidly moving through the reform process.

Impact Overview

SCL appreciates the need to pause Transmission Service Requests (TSRs) study and evaluation processes as well as Network Integration Transmission Service (NITS) study and evaluation processes while transmission planning reform occurs. SCL suggests that the BPA technical resources associated with these processes should be predominantly applied to moving all evolving grid 1.0 and 2.0 projects out of scoping and preliminary engineering phases and into facility study phase as soon as possible.

Approach to Customer Engagement

SCL recommends that the planned April and July workshops would be more effective if conducted over two days with adequate time for discussion, contemplation, and feedback within the workshop. SCL suggests that greater time for informal discussion and consensus building will lead to better outcomes with more support.

SCL request BPA consider inviting other regional entities to present their process for addressing transmission planning at a high level. SCL suggests a minimum of three entities including CAISO, MISO, and SPP. This would provide a baseline of knowledge and comparisons of best practices. BPA staff does a great job of presenting their findings on industry's best practices, but this direct education would enhance customer understanding, engagement, and discussion. This should occur at the planned April workshops and be considered as a first step even if it delays the first workshops.

Seattle City Light thanks BPA for accepting and considering these comments concerning transmission planning reform.

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cc: Melanie Jackson, Bonneville Power Administration