



October 26, 2026
Bonneville Power Administration
Transmission Services

Comments of Verrus, LLC on BPA's RAPID / SPRINT Open Season Straw Proposal

(October 19, 2026 Workshop)

Dear BPA Transmission Services Staff:

Verrus, LLC ("Verrus") appreciates the opportunity to comment on the proposals BPA presented at its October 19, 2026 Grid Access Transformation workshop.¹ Verrus supports BPA's proposal to offer speed-to-power service, through the SPRINT open season, to large loads that accept curtailment and provide meaningful, long-term benefits to the BPA grid. Verrus builds flexible, grid-interactive data centers whose battery-backed design allows for rapid reductions in grid draw on command, within defined operating limits. A Verrus data center can also serve as an active grid asset, capable not just of riding through grid disturbances, but actively supporting recovery. BPA's SPRINT proposal is the kind of product our facilities are built for, and we urge BPA to carry it into the BP-27R and TC-27R proceedings with the clarifications below.

I. Summary

As an initial matter, Verrus supports the overall SPRINT concept, for several reasons:

- **Faster use of existing capacity.** Offering up to ~5 GW of underused 500 kV and strong 230 kV headroom, with no network upgrades to start, could connect load in months.² Given BPA's load interconnection queue and expected timeline for firm service, this would be meaningful both to customers and to BPA itself.
- **Preference customers and Northwest ratepayers come out ahead.** Direct assignment and long-term PTP rates can bring incremental revenue, while protecting existing customers from costs attributable to new loads. Incremental, curtailable load additions allow for better use of the existing grid, while helping to fund long-term expansion.
- **Flexibility is rewarded.** Selecting on value, including curtailment flexibility, rather than first-come, first-served queue position favors projects that give the grid real relief, with a committed path to firm service.

¹Bonneville Power Administration, GAT: RAPID and Transmission Open Season, BP/TC-27R Pre-Proceeding Workshop (Oct. 19, 2026) ("Workshop Presentation"), https://www.bpa.gov/-/media/Aep/transmission/grid-access-transformation/Oct-19-Workshop-Presentation_updated.pdf; see also Administrator's Opening Remarks (Oct. 19, 2026), <https://www.bpa.gov/-/media/Aep/transmission/grid-access-transformation/20261019---GAT-RAPID-SPRINT---Administrator-Opening-Remarks.pdf>.

²Workshop Presentation at 22–23.

II. Requests for Clarification

While BPA is understandably working on a rapid timeframe to adopt these proposals, Verrus requests further clarification on several areas prior to issuance of a Federal Register Notice.

A. BPA Should Provide Further Detail on the Curtailment Priority for SPRINT Loads

SPRINT awards would be long-term non-firm PTP at "priority 5," interruptible under N-0 and N-1 conditions.³ To size on-site flexibility and finance a project, loads will need clarity on how this would work in practice. Verrus requests that BPA specify:

1. Where SPRINT ranks in terms of curtailment priority against firm PTP and NITS, secondary network, short-term non-firm and PLAID grid draw, and how curtailment would potentially be allocated among SPRINT customers at the same bus.
2. Whether interruptions may be only for reliability, or for economic or hydro operations as well. Additionally, the criteria for any of these potential categories of interruption should be part of BPA's presentations to stakeholders.
3. Expected frequency, duration and seasonality of curtailment at each candidate site, published with the site list.
4. Notice times, ramp limits, telemetry and disconnect requirements, applicable financial penalties or operational consequences, and any annual cap on interrupted hours.
5. How priority changes once the full interconnection process is complete (years 3–5).

B. BPA Should Clarify How System Benefits Will Be Assessed in Selecting Projects

BPA proposes to select proposals with the "greatest probability of highest Net Present Value." ⁴ Bidders would need to fully understand several aspects of this approach before the April–June 2027 window:

1. The NPV formula: discount rate, term, and how renewal risk and completion probability are weighted.
2. How flexibility is valued (depth, duration and response time of curtailment offered) against direct revenue and co-located generation.
3. Whether grid services such as demand response, reserves and avoided upgrades count as system benefits, and how they are verified.
4. How bids across sites are combined, how ties are broken, and what results BPA will publish.
5. The role and consent of the serving utility, since BPA cannot serve data centers directly.

³*Id.* at 23, 30.

⁴*Id.* at 30.



C. Other Items

- **Path to firm:** What happens if the Transmission Open Season does not clear, or its projects slip.
- **Rates:** Whether a discount for curtailable service was considered, given non-firm is priced at the firm \$2.043/kW-month.⁵
- **Treatment of long-term flexibility in evaluating total capacity:** If large loads can reliably curtail at system peaks (with appropriate contractual or physical requirements), will BPA study and/or issue awards based upon net load (adjusting for the level of assured curtailment) or total (gross) load?
- **Crediting of upgrades:** Based upon the October 19 workshop, it appears that where large loads cover the cost of system upgrades no credits would be provided. Would this be the case if a future large load is able to utilize the transmission assets that a SPRINT large load paid for?

III. Conclusion

Verrus commends BPA for moving quickly and anchoring its SPRINT proposal in ratepayer protection. With clear curtailment terms and a transparent selection method, SPRINT can bring flexible load and new revenue to the region. We look forward to the November 18 workshop, and would welcome the opportunity to answer questions or provide data as BPA develops its proposals.

Respectfully submitted,

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⁵*Id.* at 50–51.