

October 26th, 2026

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

Comments concerning BPA October 19th Grid Access Transformation (GAT), RAPID, and Transmission Open Season

Seattle City Light (City Light) appreciates the opportunity to provide comments on Bonneville Power Administration's (BPA) October 19th Pre-Proceeding workshop.

General Comments

City Light's high-level concerns:

1. Efficient and equitable use of limited BPA resources
2. Protection of existing customers and ratepayers
3. Avoidance of cost shifting and stranded-cost risk

City Light appreciates BPA acting decisively and rapidly to serve customer needs. However, a seven-calendar-day comment period is insufficient for customers to evaluate and provide substantive feedback on initiatives that may fundamentally alter BPA's transmission and interconnection framework. City Light requests that in the future BPA allow for 10 business days, at a minimum, for customers to provide feedback to BPA regarding proposals. Providing less than 10 business days for stakeholder review limits customers' ability to develop thoughtful, technically supported feedback on proposals of this significance.

City Light requests that BPA consider the impacts of limited BPA internal engineering resources being dedicated to speeding the interconnection of data centers and other new loads exceeding 50MWs. Redirecting limited internal engineering resources toward expedited service for large new loads may require other customers to rely on contract engineering resources, increasing project costs and extending development timelines. This approach may increase development costs for existing customers and therefore appears inconsistent with BPA's stated commitment to ratepayer protection.

City Light suggests that BPA implement site control and commercial readiness requirements for all Line and Load Interconnection requests prior to spending limited BPA resources on feasibility and system impact studies in the name of economic development. Meeting reasonable requirements does not limit

legitimate economic activity and is in keeping with BPA's statutory requirements. Such requirements would help ensure that BPA's limited study resources are focused on commercially viable projects and would reduce speculative queue activity.

Rapid Access Products and Interconnection Delivery (RAPID)

City Light suggests *Fast Track via Co-location* is a great incentive to allow faster interconnection only if the co-located resources are actually co-located. BPA's initial proposal is vague regarding the requirements necessary to qualify as co-located. City Light requests BPA clarify that co-located resources would qualify only if interconnected with the same BPA single interconnection as the large load or at the same BPA bus that the large load is interconnected. The system benefits of co-location are realized only when the arrangement does not require additional BPA transmission capacity beyond that already serving the associated load.

City Light requests BPA require *Dispatchable/Interruptible Load* to have a BPA monitored and remotely controlled separation point that allows BPA to manually curtail the dispatchable/interruptible load when the customer fails to meet its commitments. Absent such operational controls, BPA and existing customers may be exposed to additional reliability and compliance risks if dispatch commitments are not honored.

Updated PTP-26 Rates Language

City Light recommends that if BPA institutes credit for curtailed transmission, it be applied consistently to all transmission customers paying for comparable service. Proposing to apply such a credit only to new data center load is not in keeping with the Ratepayer Protection Pledge.

New Firm Rate Leanings

City Light requests that BPA evaluate whether the proposed framework could shift network upgrade costs from generator interconnection customers to customers taking service under the Incremental Network Rate and assess the resulting risk of stranded costs and cross-subsidization.

Transmission Open Season

City Light recommends that the existing BPA transmission queue needs to be addressed prior to open-season bidding. Conducting an open season before addressing existing queue requests could require customers serving native load, including residential and agricultural consumers, to compete for transmission capacity needed to meet existing service obligations. This is not in alignment with BPA statutory authority or requirements. This would additionally not be in alignment with the Ratepayer Protection Pledge.

City Light thanks BPA for accepting and considering these comments.

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Seattle City Light

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cc: Melanie Jackson, Bonneville Power Administration