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October 26, 2026

Via email

U.S. Department of Energy
Bonneville Power Administration
techforum@bpa.gov

RE: TC-27, TC-27R, and BP-27R

Dear Bonneville,

These initial comments are filed on behalf of the Pacific Northwest Renewable Interconnection & Transmission Customer Advocates and are directed to each of the above-referenced dockets. While we appreciate Bonneville's efforts to quickly address problems associated with growing loads and limited transmission capacity in the Pacific Northwest, we are concerned that Bonneville's SPRINT and PLAID initiatives are moving forward without sufficient analysis and without sufficient time for interested parties to understand these complex proposals and to identify potential problems and unintended consequences. We are also concerned that these programs may have deleterious impacts on the TC-27 settlement proposal that have not been adequately considered.

Accordingly, with respect to the SPRINT and PLAID proposals, we request that Bonneville provide at least two additional workshops to explain the details of the proposals, to address the many questions posed by participants in the October 19 workshop, and to entertain questions from interested parties who were unable to attend the October 19 workshop. To allow sufficient time for these additional workshops and to permit fully-informed comments, we request that the comment deadline for TC-27R and BP-27R be extended from October 26 to November 30. The current timeline allows only five business days for interested parties to analyze these proposals and prepare final comments. BPA will then jump directly to a final proposal at the planned November 18 workshop. This schedule simply does not allow enough time to fully analyze the proposals. Certainly, the five business days allowed for parties between the October 19 workshop and the October 26 deadline for final comments is far from adequate to allow interested parties to understand the proposals, identify potential problems, uncover risks for unintended consequences, and to provide fully informed comments.

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In addition, the SPRINT and PLAID proposals were rolled out on October 19, the next business day after the October 16 deadline set by Bonneville for objections to the TC-27 settlement. It is, however, likely that SPRINT and PLAID will undermine the basic purpose of TC-27, which is to allocate ATC on the Bonneville system to Conditional Firm Service. However, the SPRINT proposal, as we understand it, would allocate that same ATC to new large loads that will be interconnected to the Bonneville system on an expedited basis. The likely result is that much of the ATC that otherwise would have been available to accommodate CFS awards under the TC-27 will now be allocated under SPRINT before it becomes available in TC-27. Similarly, PLAID contemplates the short-term addition of significant large loads to the Bonneville system. It is unclear how these large additions might affect ATC or the mechanics of the TC-27 settlement.

In light of the objections to the TC-27 settlement, we are uncertain how Bonneville plans to move forward. Whatever path it chooses, we request that Bonneville permit interested parties to submit comments addressing the potential interaction of SPRINT and PLAID with respect to available ATC and the TC-27 construct.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Eric Christensen", with a long horizontal flourish extending to the right.

Eric L. Christensen
Attorney for PRITCA