

October 26, 2026

Submitted via techforum@bpa.gov

Re: Northwest Requirements Utilities Comments on BPA's Grid Access Transformation Future State

Northwest Requirements Utilities ("NRU") appreciates the opportunity to provide these comments in response to BPA's October 19, 2026 workshop ("Workshop") on its Grid Access Transformation ("GAT") initiative. NRU represents the interests of approximately 60 Load-Following preference customers and one generation and transmission cooperative, all of whom depend on Network Integration Transmission Service ("NITS") contracts with BPA for reliable load service. As a result, NRU and its members have a vested interest in the underlying methodologies that BPA uses to plan and expand its transmission system in response to its transmission customer needs.

General Feedback

In general, we appreciate the diverse set of ideas and innovative concepts presented by BPA staff at the Workshop. As a trade organization that exclusively represents public agency and cooperative utilities, we understand firsthand BPA's struggles in the timely provision of interconnection service, transmission service, and the completion of necessary transmission infrastructure under the current spotlight of surging demand clamoring for accelerated interconnections. This is without mentioning the national interest pressures associated with such load integration.

Furthermore, we generally support BPA's stated intent to develop policies in adherence with the Ratepayer Protection Pledge ("RPP") as much as possible. We support this approach in relation to Bonneville following cost causation principles and insulating existing transmission ratepayers from costs driven by computational or hyperscale loads to the maximum extent practicable. We also support approaches that would leverage increased revenues from interconnecting such large loads with minimal network upgrades, provided that (1) such non-firm revenues are determined to produce downward rate pressure for BPA's transmission customers, (2) the reliability of existing service to BPA's NITS customers is not adversely affected, and (3) BPA's abilities to rely on existing transmission capacity to meet its federal power marketing obligations are not impaired.

However, we request that Bonneville clarify with respect to its definition of "Large Load", a definition covering industrial or commercial end-use facilities greater than 50 MW, whether the adherence to the RPP will be narrowly applied to data centers and hyperscale end-use customers in isolation, or instead

applied more broadly to all Large Loads fitting under BPA's definition. This has important ramifications regarding direct assignment determinations and/or potentially additional open season requirements that could impact industrial or commercial loads that are not data centers or hyperscale end users.

Stakeholder Process, Timeline, and Scope

Although we understand BPA's interest in an expedient process to execute on its goals around interconnecting Large Loads, we hold significant concerns over the pace and approach presented at the Workshop. As described in its presentation materials, BPA proposes to hold two total public workshops on the RAPID and Transmission Open Season constructs prior to initiating the formal tariff proceeding in December. These are brand new concepts with almost no public communication or review, and as evidenced at Workshop and Q&A document, are rife with uncertainties and unanswered questions. We are skeptical that this approach will produce adequate policy scaffolding to support the aggressive modifications to BPA's status quo processes, or a public record sufficient to enable timely completion of any associated tariff and rate proceedings.

In addition, with Bonneville distributing Workshop materials near close of business on a Friday and the Workshop commencing the following Monday morning, BPA offered almost no advance review of materials for its external stakeholders. Moreover, imposing a five-day period to submit comments in response to an all-day workshop spanning a number of complex and technical topics, many of which described for the first time, is woefully inadequate. BPA's actions make clear that stakeholder engagement and meaningful feedback is of little importance. The proposed timeline and engagement process borders on insulting to BPA's transmission customers and stakeholders.

We note that over a similarly condensed timeline, the Southwest Power Pool ("SPP") separately reviewed its Conditional High Impact Large Loads Service ("CHILLS") proposal among six different stakeholder working groups in the process of finalizing its proposal.¹ Bonneville must increase the transparency and engagement between itself and the region when introducing such profound shifts in its business model. We recommend BPA establish at least one or two additional public stakeholder meetings to foster a more complete understanding of how its proposed policies would affect all transmission customers, to develop a more thorough public record, and in doing so providing a minimum of 10 business days for public feedback.

Further, while the Workshop materials covering the Speed to Power Request for Interim Non-firm Transmission ("SPRINT") and Paired Load and Integrated Dispatch ("PLAID") demonstrate that BPA has fleshed out a minimum level of detail for these processes, the same cannot be said for the Transmission Open Season ("TOS") topic. We strongly recommend BPA consider divorcing the TOS

¹ See, SPP CHILLS Filing, Docket No. ER26-1323-000 at page 42. "The proposed Tariff revisions were reviewed and approved through the robust SPP stakeholder process, including the meetings of: the Transmission Working Group ("TWG") on December 10, 2025; Economic Studies Working Group ("ESWG") on December 10, 2025; Market Working Group ("MWG") on December 15, 2025; Regional Tariff Working Group ("RTWG") on December 18, 2025; Supply Adequacy Working Group ("SAWG") on December 18, 2025; Cost Allocation Working Group ("CAWG") on January 6, 2026; and the Operating Reliability Working Group ("ORWG") on January 8, 2026."

from the upcoming SPRINT and PLAID tariff proceeding given its broader scope and impacts, relevance to the establishment and allocation of long-term firm transmission capacity, as well as to afford time to develop a satisfactory level of detail on its mechanics. Moreover, BPA's own presentation indicates that the first set of upgrades that would be offered for subscription under TOS will not be identified for another 18 months – leaving sufficient time to engage with BPA stakeholders, develop sound and defensible TOS policies, and complete a tariff proceeding before those transmission projects would be identified.

Competing Initiatives and BPA's Statutes

With the introduction of SPRINT and PLAID, Bonneville articulated its intent to revise its tariff and business practices by April 2027, and to conduct the SPRINT Open Season starting in May 2027. BPA also clarified that parties whose bids in the SPRINT Open Season are accepted must purchase long-term non-firm point-to-point ("LT NF PTP") service until such time as firm transmission capacity is created. This LT NF PTP service would be provided at the NERC priority 5 level and would come with specific limitations such as an inability to redirect the service, among others. In all, BPA's objective is to enable over 5 GW of new Large Load interconnections on an interruptible basis, all on this LT NF PTP service.

Separately, BPA is also in the final stages of its TC-27 proceeding, through which it is proposing to study and award Conditional Firm service for a separate set of queued transmission requests, likely in amounts to exceed 10 GW. Conditional Firm service is subject to periods of time or congestion where the service can be curtailed at the NERC priority 6 level, while other times is treated as NERC priority 7 firm service. Though the formal timing of completing the TC-27 proceeding is unclear, the current trajectory suggests that the SPRINT Open Season and the TC-27 Transition Study would occur essentially in parallel. This raises legitimate questions about competing initiatives. With Large Loads limited to receiving LT NF PTP service, while those participating in the TC-27 Transition Study remain eligible for Conditional Firm service, what type of capacity will be offered to a Transition Study participant that intends to serve a Large Load associated with the SPRINT Open Season? Would these transmission needs be assured to not overlap?

And equally if not more importantly, how will BPA allocate its scarce Transmission staff such that it can administer two parallel evaluating processes for allocating capacity on its system? These processes, it should be stated, would be administered in addition to BPA's existing Attachment K planning obligations, Generator and Line/Load Interconnection Studies, Local Area Reinforcement Studies, Customer Reliability Improvement Service Planning studies, NorthernGrid Regional Planning process, as well as engaging with the WestTEC Regional Study Process. NRU is concerned that with so many diverse planning functions consuming BPA Transmission's resources, BPA's ability to execute on its normal and routine planning obligations for the majority of its NITS customers may become neglected or subordinated.

Furthermore, the prospect of BPA awarding 10-15 GW of LT NF PTP priority 5 or Transition Study priority 6 CF service through these efforts on top of an already constrained grid raises other concerns. Bonneville's statutory obligations include the obligation to reserve sufficient capacity on its transmission system to meet its current and foreseeable future power marketing obligations before making any excess capacity available to all utilities on a fair and non-discriminatory basis.² With Bonneville guaranteeing LT NF PTP service only to Large Loads at limited and specific BPA substations, can BPA reasonably ensure that its statutory obligations to its preference customers will be met for NITS preference customer loads that are less than 50 MW and seeking to connect at SPRINT Open Season candidate locations? These medium-sized loads do not appear to be permitted to bid on the SPRINT Open Season, nor will they have access to the LT NF PTP capacity. For these and similar situations, BPA must specify how it will satisfy its statutory obligations when allowing certain parties to bid and receive transmission capacity.

SPRINT and PLAID

With respect to SPRINT and PLAID, BPA has proposed a new definition of "Large Load" which is "any commercial or industrial end-use facility, or aggregation of load facilities at a single site, greater than 50 MW at a single site behind one or more Points of Interconnection or Delivery." This definition lacks clarity as to the method for evaluating the load. For instance, will it be determined via the submittal of a Line & Load Interconnection Request? A NITS customer's load and resource forecast? Must the load be forecasted to reach 50 MW within a specified timeframe? Bonneville must add clarity to ensure a common understanding among its customers on the application of this new definition. We must also acknowledge that this 50-MW threshold adds yet another administrative threshold that its customers must commit to memory.

We also request BPA specify the details on how it will evaluate bids. The Workshop material notes that bids will be evaluated and selected based on those that "deliver the greatest probability of highest Net Present Value". While BPA lists helpful criteria, BPA should specify how it will apply those criteria, plus any others, in selecting bids. Further, we request that BPA clarify how it will evaluate the attribute of "more operation and curtailment flexibility". Since these Large Loads will be offered a standard LT NF PTP service, our understanding is that curtailments will be administered on a pro rata basis, and not on a load-by-load basis. It is therefore unclear how additional operational or curtailment flexibility of a particular load will provide incremental benefit beyond relief provided via flowgate curtailments.

Lastly, we request additional detail on the contractual arrangement to effect the interconnection of these large loads. At the workshop BPA indicated the potential for reliance on tri-party agreements to maintain wholesale service to its load serving entity customers and avoid interconnecting directly with end use customers. Bonneville should outline the structure for any such agreement, including how financial requirements will be imposed, how contractual performance obligations will be delineated, as well as any penalties for non-performance. Given the significant monetary and service quantities at

² Transmission System Act § 6.

stake with Large Loads, BPA's contracting vehicles must enable its NITS customers to avoid shouldering the financial or performance risks associated with large hyperscale load interconnections.

Transmission Open Season

As stated above, many details remain unknown for how BPA will run its TOS process. For instance, BPA has not yet formally defined "High Opportunity Transmission" ("HOT") projects other than those that generally meet a regional need and that are identified in numerous scenarios. However, BPA's Workshop materials note that the specific criteria are "To Be Determined" and will be established at a later date. Given the billions of dollars at stake with respect to large-scale transmission that BPA may identify in the future through TOS, BPA must provide greater transparency into these project determinations. Such critical details cannot be overlooked or left to a single remaining Customer workshop.

We also urge BPA to clarify how its planning obligation to its NITS customer load and resource forecasts factors into the TOS. We understand from the Workshop slides that all transmission needs less than 50 MW appear to be considered "base" transmission assumptions in the TOS. Does this include all NITS customer load forecasts that are less than 50 MW, including from any potential resource? And, importantly, the Workshop materials do not specify the rate treatment associated with transmission reinforcements to meet these base assumptions, especially in situations where "base" assumptions may not be met by a HOT project.

Further, BPA indicated a potential future state where it does not administer transmission queues, and instead parties bid on excess capacity brought by its TOS projects. BPA must take the time to specify how it will transition from being a Transmission Provider with hundreds of requests in its transmission queue, representing many GW of transmission needs, to one where it does not maintain a transmission queue at all. Given all these uncertainties, BPA must seriously consider separating TOS from the SPRINT/PLAID tariff proceeding and take the appropriate time to develop a framework that is defensible, clear, and works for the region.

Conclusion

As we noted at the outset, while we appreciate the innovative constructs and BPA has described on SPRINT and PLAID, these initiatives are not yet ready for tariff revisions or a formal proceeding. Meaningful additional customer and stakeholder engagement is required to address important gaps and clarify how BPA will satisfy its statutory obligations under these new processes, as well as answer a number of outstanding questions. We also urge BPA to allow more than 5 business days to provide comments in response to its GAT workshops going forward. Though we understand and appreciate the pressure on the region and on BPA specifically to succeed in interconnecting Large Loads, it must not institute processes in a way that rushes half-baked concepts or consumes its resources in a way that jeopardizes reliable, dependable load service to its customers.

Sincerely,

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Northwest Requirements Utilities