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Bonneville Power Administration
905 NE 11th Ave
Portland, OR 97232

Submitted via TechForum

Re: Alliance of Western Energy Consumers' Comments regarding Grid Access Transformation RAPID and Transmission Open Season

The Alliance of Western Energy Consumers ("AWEC") appreciates the opportunity to provide comments on Bonneville Power Administration's ("BPA") October 19, 2026 BP/TC-27R Pre-proceeding workshop regarding Grid Access Transformation's ("GAT") Rapid Access Products and Interconnection Delivery ("RAPID") and Transmission Open Season.

AWEC is a trade organization whose members include many of the Region's largest employers and consumers of electricity and natural gas. AWEC's members are responsible for providing tens of thousands of highly paid, technical, family-wage jobs across a broad range of industry sectors such as agriculture, aeronautics, air products, metals, pulp and paper, information technology and more. As such, AWEC's members are also significant consumers of electricity, paying millions of dollars for power and transmission services each year. They take service from both public power customers of BPA, as well as regulated investor-owned utilities who purchase transmission services from BPA. AWEC members' host utilities take both Network Integration Transmission Service ("NITS") and Point to Point ("PTP") service products from BPA Transmission. Given the energy-intensive nature of many industrial processes, AWEC members are focused on both costs associated with electricity service, including transmission, and reliability.

At the October 19th workshop, BPA previewed two new "speed to power" proposals for "large loads" (defined as greater than 50 MW at a single site¹): Speed to Power Request for Interim Non-firm Transmission ("SPRINT") and Paired Load and Integrated Dispatch ("PLAID"). SPRINT and PLAID would provide interim non-firm transmission service subject to curtailment provisions. BPA's purpose in introducing these two new transmission products is, at least in part, in recognition of the Ratepayer Protection Pledge, a federal initiative introduced by President Trump. The Ratepayer Protection Pledge is aimed at ensuring that data centers pay

¹ BP/TC-27R Pre-Proceeding Workshop re GAT: RAPID and Transmission Open Season at slide 20 (Oct. 19, 2026).

their way while existing ratepayers pay theirs.² The Transmission Open Season concept would be the path to long-term firm transmission service for SPRINT and PLAID loads, as well as other future loads above 50 MW.

AWEC appreciates BPA's continued thinking and commitment to progress in facilitating industrial load interconnections to its transmission system, including data center loads, and looks forward to continuing the conversation on innovative ideas that create a "win-win" for expedited interconnection of new loads utilizing existing capacity on BPA's transmission system. AWEC is, however, concerned at the pace BPA has proposed to effectuate changes to facilitate its goals. Two pre-proceeding workshops are not sufficient, particularly when significant questions remain outstanding from the October 19th workshop. While AWEC wants to see BPA move expeditiously, doing so should not come at the expense of clear understandings of BPA positions and leanings prior to filing an FRN or at the expense of BPA's consideration of stakeholder feedback. AWEC encourages BPA to add at least one more pre-proceeding workshop so that stakeholders have the ability to react to BPA Staff's final "leanings" ahead of the FRN and BPA's Initial Proposal.

More substantively, AWEC has several areas of concern that should be addressed. First, AWEC wants to ensure that these new proposals do not impair BPA's obligations to preference customers and current transmission customers. Additional clarity on the interaction between RAPID initiatives, the potential use of conditional non-firm products as a bridge to firm service, and implications for existing customers is needed.

Second, AWEC is concerned that "medium" sized loads (13 MW – 50 MW) do not have a clear path forward for expedited access to non-firm transmission service, even if the current grid can accommodate the request without the need for network upgrades and/or if paired with co-located generation. While AWEC understands that BPA's greater than 50 MW line is drawn with some comparison to other areas and is driven by a desire for BPA not to be a barrier to data center growth, AWEC does not want to see medium sized loads left behind, including other industrial loads such as manufacturing.

Third, BPA's proposals and leanings related to cost responsibility for load interconnections pursuant to SPRINT and PLAID give AWEC pause. Additional clarification is needed as to whether BPA intends the cost allocation proposals made in response to the Ratepayer Protection Pledge to apply beyond data center loads. The basis for extension to non-data center loads is unclear and at present, unsupported. This is an issue of particular concern

² *Id.* at slide 10; see also <https://www.whitehouse.gov/releases/2026/03/ratepayer-protection-pledge/>

given BPA's leanings that SPRINT and PLAID customers will be directly allocated all interconnection costs (for both non-firm and long-term firm service). AWEC opposes application of the 50 MW threshold for long-term firm service applying to Contracted For Committed To ("CF/CT") loads with headroom under their CF/CT designations – if 50 MW of load growth is requested at a CF/CT site, the only amount that should be considered subject to Transmission Open Season would be "new" load growth in excess of 50 MW above CF/CT designated amounts.³

Relatedly, while AWEC supports the principles of cost causation and new growth paying for new growth, as well as protecting existing ratepayers from subsidizing new large loads and stranded cost risk, achieving these outcomes should not result in new large loads, data center or not, significantly subsidizing existing customers. The principles of cost causation should be preserved – where cost causers pay for the costs that they put onto the system and the users of the system pay for the benefits received. Generally speaking, AWEC is concerned that even minimal network upgrades may also provide system benefits and finds that there is an equity question as to whether a later-interconnecting customers could or should benefit for free from upgrades paid for by the initial customer (i.e. additional bays at a substation). In the long-term, while direct assignment of costs for firm service including network upgrades and up-front O&M costs is one way to mitigate stranded cost risk for customers, other options that allow for a sharing of system benefits while mitigating stranded cost risk may also be appropriately considered.

In addition to these overarching comments, significant questions remain unanswered:

- More information on proposal evaluation criteria for SPRINT, how it will be weighted, and if demand exceeds availability, how BPA will determine "the highest value" and timing for disclosing this information relative to when proposals would be due.
- Timing of identification of potential candidate sites for SPRINT.
- When and how will "additional requirements" for SPRINT service will be identified.
- More information on what constitutes "within a BPA-approved electrical proximity standard."

³ As AWEC's comments regarding the NITS Business Practice adding the "non-trended" load growth line have indicated, AWEC does not consider growth at a Contracted For, Committed To ("CF/CT") facility to constitute "new growth" until growth at the site exceeds CF/CT designations.

- How will BPA measure capacity demand for co-located load and generation when considering firm service awards (i.e. net load or gross load)? How will this be studied and what contractual and/or physical requirements will apply?
- What specific contractual and/or physical requirements will there be related to curtailment and co-located resources?
- What alternatives did BPA explore, if any, before committing to the Transmission Open Season concept?
- What specific evaluation criteria and process will be employed in the prospective looking Transmission Open Season concept?
- Which specific costs may be allocated to large load customers for long-term firm service? Would allocated costs be limited to network upgrades at substations or include reconductoring existing transmission and/or construction of new network transmission lines?

Again, AWEC appreciates BPA's thoughtful approach to providing speed to power for large loads through the RAPID initiatives. Given the short turn-around time for comments, AWEC has provided high level feedback and identified areas where additional discussion is necessary. AWEC will continue to engage in this process and may provide more targeted feedback in response to the next workshop.

/s/ Bill Gaines

Executive Director

Alliance of Western Energy Consumers