

October 26, 2026

via email (techforum@bpa.gov)

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: Comments of EDP Renewables NA on the Proposed Reforms Presented at the October 19, 2026 GAT Workshop: RAPID and Transmission Open Season (BP/TC-27R Pre-Proceeding Workshop)

I. INTRODUCTION

EDP Renewables NA (“EDPR”) submits these comments on the Bonneville Power Administration’s (“Bonneville” or “BPA”) Grid Access Transformation (“GAT”) proposals discussed at the October 19, 2026 workshop (the “October Workshop”).¹

Stakeholders across the region agree that faster access to existing transmission capability is needed and that Bonneville needs a workable approach to system expansion, consistent with reliability, existing rights, and ratepayer protections. EDPR finds Bonneville’s near-term proposals largely workable, but the desire to expedite near-term proposals should not predetermine longer-term Future State decisions or impair existing customers’ rights.

In refining its proposals, EDPR recommends that Bonneville strive to protect existing transmission requests and rights; establish transparent program requirements; adopt commercially workable cost protections; and work to release draft tariff, rate, and agreement language with sufficient time to allow for meaningful, holistic review with stakeholders.

II. BACKGROUND

The October Workshop introduced two near-term proposals and a separate Transmission Open Season concept. The Transmission Open Season is part of Bonneville’s proposed “Future State” planning and expansion framework, whereas the two Rapid Access Products and Interconnection Delivery (“RAPID”) proposals—Speed to Power Requests for Interim Non-Firm Transmission (“SPRINT”) and Paired Load and Integrated Dispatch (“PLAID”)—offer near-term, interruptible service options.

SPRINT is a one-time solicitation intended to connect approximately 5 GW of hyperscale data-center load at selected locations using existing transmission capacity.² PLAID is a recurring

¹ Additional details regarding the GAT program, including the presentation materials provided at the Workshop (“October Presentation”) are available at <https://www.bpa.gov/energy-and-services/transmission/grid-access-transformation-project>.

² October Presentation at 21-35.

expedited process for loads paired with generation. Both contemplate interim, interruptible non-firm service, but differ in eligibility, operation, and potential paths to firm service.³

The Transmission Open Season proposal would allocate available firm capacity associated with transmission expansion portfolios developed through Proactive Planning, using auctions for loads exceeding 50 MW.⁴ Bonneville also proposed Precedent Transmission Service Agreements (“PTSAs”), security, milestones, and stranded-cost protections.

Implementation will require revisions to Bonneville’s Open Access Transmission Tariff (“OATT”) and rates, including a new tariff attachment and a new Long-Term Non-Firm (“LTNF”) Point-to-Point (“PTP”) rate.⁵ Bonneville indicated that its proposals seek to align with the White House’s Ratepayer Protection Pledge.⁶

Bonneville plans a final staff proposal at the November 18, 2026, workshop, expedited rate and tariff proceedings beginning in December, and final Records of Decision in April 2027.⁷

III. COMMENTS

The comments below highlight EDPR's concerns regarding BPA's Future State framework, the near-term RAPID proposals, and the proposed implementation process. While these comments primarily focus on the proposed Transmission Open Season and potential auction design as a key component of the Future State, EDPR generally supports BPA's large load policies as pathways for these loads to commit to securing new generation to meet their incremental demand, maintain regional resource adequacy, and avoid shifting costs to existing ratepayers. Although these initiatives are at different stages of development, each raises important questions regarding transmission access, cost allocation, and the need for transparent, clear, and nondiscriminatory program requirements.

A. Future State Proposal

Bonneville’s Future State proposal would fundamentally change how expansion capacity is planned and allocated. Any new framework must preserve open access, comparability, and commercially reasonable opportunities to obtain service. EDPR supports Bonneville’s efforts to quickly develop the Future State and engage stakeholders early in the design.

i. Transmission Open Season

During the GAT workshop, BPA introduced a new concept for its Future State framework: the Transmission Open Season. As currently described, BPA would allocate available transmission capacity through a competitive process, clearing bids only if the net present value (NPV) of

³ October Presentation at 36-46.

⁴ October Presentation at 55-61.

⁵ October Presentation at 48-54.

⁶ October Presentation at 10; see also The White House, *Ratepayer Protection Pledge* (March 4, 2026).

⁷ October Presentation at 8.

Long-Term Firm (LTF) transmission commitments covers the associated incremental capital and operating costs. BPA noted that this represents a significant departure from the traditional first-come, first-served approach that has historically governed access to transmission and interconnection rights. While exploring alternatives to the existing process is reasonable given growing concerns about queue management, project readiness, and efficient use of the regional transmission system, any shift toward a new allocation model should be evaluated carefully against its own potential tradeoffs, unintended consequences, and asymmetrical risks that developers face at bid time which can result in further implementation issues.

Further, some regions, including the Southwest Power Pool (SPP), have similarly sought to develop integrated planning models that coordinate transmission and interconnection policies. As BPA continues to develop its expansion planning framework, EDPR encourages BPA to work closely with stakeholders to establish the assumptions, inputs, and study methodologies that will drive transmission expansion decisions. Similar to SPP's Consolidated Planning Process (CPP), stakeholders should have meaningful opportunities to review and provide input on planning assumptions before studies are conducted and transmission solutions are selected. BPA should also provide a schedule for expansion planning, including key study milestones, stakeholder review periods, and the timeline for BPA transmission build decisions. This transparency would provide customers with greater certainty regarding when transmission needs will be evaluated, when investment decisions may occur, and how those decisions could affect future transmission and interconnection opportunities in the region.

ii. Auction Design

While BPA raises legitimate concerns regarding traditional first-come, first-served interconnection processes and their ability to allocate scarce transmission capacity, EDPR encourages BPA to carefully evaluate both the shortcomings of the current framework and the applicability of any replacement mechanism. The now well-established limitations of first-come, first-served should not automatically lead policymakers to conclude that auctions or competitive procurements represent a complete solution to this specific problem. Competitive auctions may favor entities with greater access to capital or higher tolerance for development risk rather than projects that ultimately provide the greatest long-term value to customers and result in winning bids being developed. Likewise, auction outcomes can be highly sensitive to design choices, information asymmetries, and assumptions regarding future system conditions.

Even considering these concerns, BPA may ultimately decide to pursue an auction-based allocation framework. If so, the auction design should be thoughtfully tailored to the specific objectives BPA is seeking to achieve, rather than assuming that a competitive procurement process will inherently produce better outcomes. Should BPA choose to further develop this concept and present a more detailed proposal at the November 18, 2026 workshop, EDPR encourages BPA to prioritize the following questions and auction design principles before engaging stakeholders on the next iteration of this proposal.

First, under BPA's proposed Transmission Open Season, BPA is proposing to move from a transmission request model to ostensibly a transmission planning-and-subscription model. BPA should provide more details regarding whether this policy resembles an auction, or a procurement with a scoring method. Under a traditional auction, everyone bids on the same product and price determines the outcome. In contrast, BPA's proposal appears like participants could submit different contract packages, and BPA then selects the most attractive proposals within an optimized portfolio of projects. Those are very different frameworks. If BPA intends to evaluate criteria such as Net Present Value (NPV), length of transmission service commitment, upfront capital contributions, regional benefits, and project risk, then the process may more conceptually resemble a multi-attribute procurement process rather than a simple auction. The distinction is consequential because each framework allocates scarce transmission capacity differently and creates different incentives for market participants.

Second, and relatedly, BPA should clearly define the transmission product being allocated through the Open Season, the rights associated with a successful bid, and the study assumptions and other information bidders will need to evaluate transmission availability before making long-term commitments. BPA further defined the obligations that customers will assume under the Transmission Open Season, including commitments to future firm service, security requirements, and milestone obligations.⁸ However, BPA has not yet provided equivalent clarity regarding the specific transmission rights customers would receive in exchange. For example, BPA has indicated that a longer commitment length could improve the likelihood of a proposal being selected, given the potential increased revenue it would guarantee. However, stakeholders cannot evaluate the merits of that tradeoff without understanding both the rights being granted and the evaluation methodology that BPA will use to judge competing proposals. Bonneville should disclose its approach to cost and revenue inputs, discount assumptions, treatment of shared-system benefits and allocation of costs and capacity among winning bids. The Transmission Open Season also relies heavily on NPV, but stakeholders cannot assess the framework without greater transparency regarding how NPV will be calculated and applied. A narrow revenue test could also undervalue expansions with broader regional benefits.

Third, efficient auction outcomes depend on participants having sufficient information to make informed bids. Under BPA's proposed framework, developers may be required to submit binding commitments before critical variables are known, including transmission upgrade costs, the scope and timing of transmission expansions, the quantity and location of available transmission capacity, and the methodology that BPA will use to evaluate bids. As a result, participants could face significant uncertainty regarding both the cost of obtaining service and the value of the transmission rights ultimately awarded.

⁸ Questions and Answers Document from October Workshop at 5.

BPA's Q&A document underscores this fundamental information asymmetry. Any prospect for substantial upgrade costs and a multi-year delay before firm transmission service becomes available could significantly impact bidding behavior, and reasonably so. Faced with these uncertainties, developers may seek to hedge risks and bid less aggressively, require higher expected returns in their bids, or decline to participate altogether, ultimately reducing competition and the effectiveness of the Open Season itself. To promote efficient participation and better outcomes, BPA should provide greater transparency regarding estimated upgrade costs, study assumptions, transmission planning methodologies, available capacity, bid evaluation criteria, and the framework that will govern cost responsibility before soliciting binding commitments.

Lastly, the Future State design warrants a separate, meaningful stakeholder process. At the October Workshop, and as indicated in BPA's Q&A document, Bonneville explained that it would be using a consultant to design and potentially run the auctions and confirmed that stakeholders should not expect to be included in that process due to the expedited timeline.⁹ Given the issues raised and the novelty of this policy concept for BPA, stakeholders should participate in developing that methodology. At a minimum, Bonneville should publish the proposed valuation, eligibility, and other key parameters before adopting them.

iii. TC-27 Transition Planning

BPA issued a Q&A document which clarified that RAPID and TC-27 are intended to proceed on separate tracks and that active TC-27 requests are expected to retain a path to firm service, conditional on the outcome of the TC-27 settlement.¹⁰ EDPR appreciates that clarification. However, BPA should clearly identify which requests qualify for that protection and ensure that implementation of the Transmission Open Season does not impair the expectations of existing customers that have continued to progress through BPA's existing processes.

B. Near-Term RAPID Proposals

EDPR appreciates BPA's efforts to develop large load policies such as PLAID and SPRINT to provide a faster path to service for large loads while maintaining reliability and adhering to the Ratepayer Protection Pledge. In particular, we support BPA's recognition that co-located generation can play an important role in serving new load growth and reducing reliance on already constrained transmission infrastructure. However, RAPID should accelerate service without impairing existing firm or non-firm rights. Bonneville should establish enforceable curtailment conditions and identify the governing tariff, business practice, and contract provisions so that stakeholders can better understand impacts.

⁹ Questions and Answers Document from October Workshop at 8.

¹⁰ *Id.*

i. SPRINT

SPRINT is a mechanism to make use of existing transmission capability while providing large loads with an expedited path to service. SPRINT would award interim service at selected substations based on proposal value rather than queue priority. EDPR appreciates BPA's clarification that SPRINT is intended to provide a bridge to future firm service and that participation in SPRINT would not affect existing queue positions or established transmission and interconnection processes. BPA should ensure these protections are clearly reflected in the governing tariff, business practices, and service agreements.

As BPA further develops SPRINT, it should provide additional transparency regarding the amount of available transmission capacity, the locations where service may be offered, and the criteria that will be used to evaluate competing proposals. BPA has indicated that awards will be based on the value provided to BPA and its customers. To promote transparency and confidence in the process, BPA should clearly describe the factors that will be considered and the methodology that will be used to compare proposals.

EDPR also encourages BPA to further evaluate the potential impacts of introducing up to 5 GW of new Priority-5 Long-Term Non-Firm service on existing transmission customers and the broader non-firm market. BPA has acknowledged that SPRINT may affect the availability of other non-firm transmission products. Stakeholders would benefit from additional information regarding these potential impacts and how BPA intends to manage any resulting operational or market effects.

ii. PLAID

PLAID is a recurring process for paired large loads and generation, using coordinated dispatch and net-flow controls to enable interim operation without certain network upgrades. Bonneville should explain PLAID's electrical-proximity, readiness, and upgrade criteria, including whether oversized generation, storage, and technically equivalent configurations may qualify. Expedited interim operation should not be confused with advancement through the ordinary generator-interconnection queue.

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Bonneville should also clarify the effects of PLAID participation on existing generator interconnection and load requests, particularly when an underlying request is modified or withdrawn. Interim rights must remain distinct from ordinary interconnection rights.

C. Proposed Process

Before November 18, Bonneville should circulate draft tariff and rate language, agreement forms, engineering assumptions, and an explanation of how RAPID interacts with the Future State and TC-27 transition. Customers need operative terms, not only policy concepts, to evaluate these changes.

Bonneville should respond to material stakeholder comments and provide further technical discussion. Future State auction design should not be finalized through an expedited RAPID proceeding merely because it was briefly introduced at the October Workshop.

IV. CONCLUSION

EDPR supports reliable, transparent, and commercially workable expansion of transmission access across the Bonneville system. Bonneville should protect existing rights, clearly define the terms and conditions of interim service, establish objective and transparent selection criteria, and adopt cost allocation and cost-recovery approaches that support financeable project development. EDPR also encourages BPA to continue developing the Future State framework and Transmission Open Season through a robust stakeholder process that provides sufficient transparency regarding planning assumptions, transmission products, customer obligations, and bid evaluation methodologies before requiring binding commitments. Near-term RAPID reforms should remain distinct from, and should not predetermine, long-term decisions regarding the Future State and Transmission Open Season framework.

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EDPR appreciates Bonneville's consideration of these comments and the recommendations contained herein. Nothing contained in these comments constitutes a waiver or relinquishment of any rights or remedies provided by applicable law or under Bonneville's tariff or otherwise under contract.

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