GridCARE

COMMENTS OF GRIDCARE ON BONNEVILLE POWER ADMINISTRATION'S SPEED TO POWER REQUEST FOR INTERIM LONG-TERM NON-FIRM TRANSMISSION (SPRINT) OPEN SEASON PROPOSAL

Submitted October 26, 2026

I. INTRODUCTION AND SUMMARY

GridCARE supports the Bonneville Power Administration's (BPA) SPRINT open season proposal and appreciates the opportunity to comment following BPA's October 19, 2026, Grid Access Transformation workshop. SPRINT is a meaningful step toward connecting large loads to the Northwest transmission system faster, and GridCARE commends BPA staff for its innovative approach.

GridCARE is a Power Acceleration provider that helps transmission providers such as BPA, and the utilities they serve, connect large loads years sooner using grid infrastructure that is in place today. By improving utilization of the grid already built and paid for, Power Acceleration spreads fixed grid costs across more electricity sales, putting downward pressure on rates and improving affordability for all of BPA's customers. Our comments make three points:

1. **Site selection should be data-driven.** Analytical tools can identify the substations with the most usable headroom, and the specific hours and contingencies under which that headroom is constrained. Selecting sites on that evidence delivers the most megawatts and the greatest affordability benefit for BPA's customers, and tells BPA and applicants, before any award, how much flexibility each site will actually require.
2. **Selection criteria should be transparent and should give priority to projects that commit to qualified flexibility under defined service terms.** A published scoring matrix is standard practice in RTOs across the country in selecting projects and should be utilized in this instance as well. An important factor for BPA's selection of a project is that it is backed by an agreement that defines the flexibility they will provide, the conditions that trigger it, and the bounds of that obligation can be served without diluting existing conditional firm service. Where requests exceed the headroom at a site, capacity should be allocated in proportion to the net-additional, qualified flexibility each project brings and pays for, so that every award is fair, transparent and verifiable.
3. **SPRINT should establish qualification criteria for flexibility.** Flexibility is broader than load curtailment when conditions are tight. It includes generation, grid-enhancing technologies (GETs), batteries and virtual power plants (VPPs), on both sides of the meter, as well as load-side flexibility and curtailment. BPA should specify how flexibility must perform,

what contingencies and other conditions will trigger it, and that the obligation is fixed for the term of the agreement and does not grow as later loads connect. This is what makes the service financeable. A bounded obligation with defined triggers can be modeled and priced; an open-ended one cannot. That, more than anything else in SPRINT, will decide whether offtakers accept the service and can raise capital against it.

II. SITE SELECTION SHOULD BE DRIVEN BY DATA, NOT LUCK

BPA should use rigorous capacity analysis, rather than judgment alone, to choose the SPRINT interconnection sites. At the workshop, BPA staff shared a map of its 500 kV substations across Washington, Oregon, Idaho and Montana, divided into West and East zones. BPA indicated that the candidate list may be a subset of 5 to 15 substations, with service ultimately provided at roughly five sites. Staff explained that sites would be selected based on "common sense." One commenter observed that "luck" will also play a role.

GridCARE respectfully submits that a transparent, data-driven and contract-based framework should replace reliance on judgment or chance. A defined flexibility service agreement and a published scoring matrix provide a more reliable and equitable basis for award decisions. Tools now exist to evaluate each candidate substation against actual system conditions. Power Acceleration analysis of the transmission provider's own system data, across thousands of hours, contingencies and scenarios, identifies:

- Which substations can host the most new load, and when;
- How much latent capacity exists beyond what conventional worst-case planning studies show;
- The specific hours and contingencies under which service to a new load would be constrained; and
- Which flexibility resources, on either side of the meter, can bridge those intervals most economically and with the least disruption to the customer's operations.

This quantified analysis benefits BPA and SPRINT customers alike. BPA can select sites with confidence that they will deliver the most megawatts and the greatest affordability benefit, and can size the flexibility requirement at each site to the constraint actually observed rather than to a worst-case assumption. It gives customers a clear, data-backed understanding of expected service availability and interruption exposure, which is the operational-risk information that lenders and investors require before financing large load projects. By replacing "luck" with analysis, BPA converts an uncertain allocation into one that offtakers can accept and deploy capital against.

GridCARE encourages BPA to incorporate this type of data-driven capacity analysis into its site selection and to share the results with prospective SPRINT participants.

III. PROJECT SELECTION CRITERIA SHOULD BE TRANSPARENT AND CREDIT QUALIFIED FLEXIBILITY

A. A Published Scoring Matrix to Select Projects Is Commonly Used by RTOs

Several commenters expressed concern about how BPA will choose among competing SPRINT projects. GridCARE shares the view that the process must be fair and predictable. A clear solution exists: BPA should adopt a scoring matrix of selection criteria and publish it before the open season begins.

This has long been common practice across the country. RTOs routinely select among competing proposals using multi-factor criteria set out in their tariffs and known to bidders in advance, covering factors such as financial capability, readiness and schedule, cost containment, operations, and overall value to the system rather than price alone.

These processes withstand scrutiny because the criteria are known in advance. A published scoring matrix applies the same objective criteria to every request, instead of discretionary judgments that invite disputes, and it provides transparency. Price matters, but it is not the only factor. Selecting transmission projects is not the same as selecting large loads to interconnect, but the lesson carries over: a well-defined set of criteria, published in advance, helps identify the strongest projects and deliver the greatest benefits to customers and the system.

GridCARE recommends that BPA's SPRINT matrix include, at a minimum:

- readiness to proceed,
- megawatts delivered and affordability benefit at the chosen site,
- the quantity and quality of qualified flexibility the project brings, and
- the customer's willingness to accept defined service terms (discussed below).

Because SPRINT serves load from existing capacity and requires no network upgrades, a large up-front financial commitment matters less than it would in a conventional process. What matters is that awarded capacity does not sit idle. An applicant selected for an allocation should have a defined window, such as 30 days, to accept the service terms; if it does not, the allocation should be offered, on the same proportional basis, to the other applicants at that site whose qualified requests were not fully met.

The matrix should also state the allocation rule that applies when qualified requests at a site exceed the available headroom. GridCARE recommends that capacity be allocated in proportion to the flexibility each project offers, meaning the net-additional, qualified flexibility it commits and funds, and not in proportion to the megawatts it requests. Where applicants offer equal flexibility, the tie should go to readiness to proceed, measured by the earliest date the load can take service, and then to the date of the complete application. The rule should be applied uniformly to every applicant and recorded in an allocation register that BPA can disclose. This rule also discourages over-bidding. An applicant gains nothing by inflating its request, because its share depends on flexibility it must actually qualify, fund and demonstrate at commissioning; an applicant that overstates its flexibility bears the cost of delivering it or forfeits the capacity. Tying the award to flexibility that is real, additional and paid for by the applicant is the fairest basis for allocation, because the capacity exists only to the extent that flexibility is there to firm it.

B. Priority Should Be Given to Projects Backed by a Qualified Flexibility Service Agreement

BPA should give priority to projects that accept a flexibility service agreement with BPA with pre-defined service terms. Under that agreement, the customer commits in advance to the flexibility it will provide, the conditions under which BPA may call it, and how those conditions will be managed. Flexibility in this sense is broader than switching off load. It is the ability to bridge a constrained interval from either side of the meter: behind the meter, through customer-owned batteries, backup generation held in reserve, workload shifting and load curtailment; and in front of the meter, through grid-scale storage, generation redispatch, VPPs, remedial action schemes and GETs such as dynamic line ratings, advanced power-flow control and topology optimization. A mitigation portfolio assembled from these resources allows a facility's grid draw to flex while its operations continue. The agreement's terms would cover the flexibility resources credited, the triggering conditions, maximum event frequency and cumulative hours, response depth and timing, operational obligations, and the conversion path to firm service.

For BPA, enforceable terms make it possible to offer non-firm service without affecting existing customers. BPA can place the new non-firm service below existing customers' rights by agreement, and the burden falls on the new SPRINT customer rather than on existing users. Two conditions keep it there. First, the flexibility must be paid for by the offtaker of the power: the SPRINT customer procures, funds and owns the batteries, backup generation and other mitigation it relies on, and pays for the qualification analysis and ongoing operations, so that nothing is socialized to BPA's other customers. Second, the flexibility must be net additional: new resources or new commitments that did not exist before, rather than flexibility already sold into demand-response, capacity or ancillary-service markets or already relied upon by BPA for another purpose. Under these conditions each

SPRINT award leaves more flexible capacity on the system than it found and does not bid up the price of resources BPA already depends on. Defined, verified response requirements and remedies for non-performance then give BPA something it can rely on operationally.

For the customer, the agreement provides a clear, enforceable understanding of the service it is buying and the conditions under which it will be asked to flex.

This directly answers a concern raised at the workshop. Commenters worried that SPRINT could dilute the conditional firm service BPA currently provides to existing customers. A defined flexibility service agreement prevents that outcome in both directions:

- **Existing conditional firm customers are protected.** New SPRINT load operates within capacity identified as available, under terms that keep it from impinging on existing service.
- **New SPRINT customers are protected.** Their service and their flexibility obligations are defined by contract and are not diluted as additional customers connect.

Both protections matter to project success. A service commitment that cannot be eroded is a key factor lenders weigh when deciding whether to finance a large load project. GridCARE urges BPA to recognize such agreements in its selection criteria.

C. SPRINT Should Establish Qualification Criteria for Flexibility

Flexibility describes a facility's ability to respond. Qualification establishes the conditions under which BPA can rely on that response. Even a facility that could reduce its grid import to zero instantly, whenever asked, and remain off indefinitely would not tell BPA how much power it can safely consume at a given substation, when it must respond, or whether its disappearance and return would destabilize the system. GridCARE therefore urges BPA to publish, as part of the SPRINT open season, qualification criteria that answer two questions: how flexibility must perform, and under what conditions it will be called.

How flexibility must perform. Technical qualification should establish, for each credited resource and for the site as a whole, the amount, location, timing, duration and availability of the response, including response deadlines tied to the applicable emergency ratings, allowable step changes, ride-through, restoration conditions, and behavior on loss of controls or communications. The criteria should apply equally to every flexibility resource regardless of which side of the meter it sits on: a battery, a backup generator, a VPP, a GET or a workload reduction should count toward the requirement to the extent its electrical effect at the limiting constraint has been studied and verified. Qualification should also confirm that the credited flexibility is net additional. Capability already committed to another market product or reliability obligation cannot be counted a second time

toward a SPRINT obligation, and the applicant should demonstrate that it bears the cost of the resources it offers. Commissioning tests before energization and periodic re-certification against the accepted qualification keep the credited capability current as the facility, its resources and the system change.

When flexibility will be called. Equally important, the triggering conditions should be defined in advance and tied to identified contingencies and system conditions, not left to open-ended discretion. The flexibility obligation at each site should be derived from the contingency analysis for that site, meaning the specific outages, loadings, seasons and hours under which the latent capacity is unavailable, and expressed as a bounded obligation: the event classes that may trigger a call, the maximum reduction depth, the maximum duration per event, the maximum frequency or cumulative hours per year, notice requirements, recovery conditions and exceptions. Reliability calls, voluntary economic participation and emergency action should be distinguishable in the record, and each instruction should be traceable to the operating condition and allocation rule that produced it. BPA's existing emergency authority would remain in force.

First movers should not be penalized by future load growth. Headroom is shared, and a flexible connection that enjoys favorable availability when it enters service can face greater exposure later as neighboring projects ramp. The customers who accept SPRINT's terms in its first open season are taking on the most risk: they are committing capital to a new and untested service, funding the flexibility that makes the program work, and proving the model for everyone who follows. They should be protected as first movers, not penalized for being first. SPRINT should therefore make clear that an awarded customer's flexibility obligation is fixed by its agreement for the agreed term and is not subject to increase as additional flexible loads connect at the same substation or on the same path. Later entrants should be served from the headroom remaining after existing commitments are honored and should bring their own net-additional flexibility to do so, under permitted-change rules defined in advance. Increasing interruption exposure cannot be a silent rewrite of the service a customer has contracted for; if a material change threatens an existing commitment, the response should follow an agreed requalification and remedy process.

These criteria are what allow offtakers to accept SPRINT service and finance capital deployment against it. A lender underwriting a large load facility must model the project's interruption exposure over the life of the loan. It can do so only if the quantity of service is defined at a specified point of delivery, the flexibility obligation is bounded in depth, duration and frequency, the triggers are tied to identified contingencies rather than to discretion, and the allocation is protected against dilution by later entrants for an agreed term. A non-firm product whose curtailment rights are broad or unlimited, or whose exposure can grow as the queue fills, cannot be underwritten on reasonable terms no matter how capable the facility's controls are. Qualified

flexibility with a bounded, contingency-based obligation can be modeled, priced and financed, and the same evidence gives BPA a defensible record for operating the service and for showing the region that each award was made on objective grounds. GridCARE's modeling of flexible connections in other regions indicates that such loads draw grid power in well over 99 percent of hours, with mitigation needed on the order of tens of hours per year. A defined obligation of that size is a sliver of annual hours in exchange for years of earlier access.

IV. CONCLUSION

SPRINT is a significant departure from how BPA has historically allocated transmission service, but it is a step in the right direction and in step with the industry. Flexible and conditional service arrangements for large loads are being adopted or actively considered by grid operators, utilities and state commissions nationwide, and FERC has directed every RTO and ISO to address transmission service for flexible large loads.[1] These programs have opened the door to connecting large loads on the existing system, and BPA deserves credit for moving quickly to do the same. Whether SPRINT succeeds, however, will turn on whether the developers of critical infrastructure projects can find the capital to finance service under these agreements. Flexibility that is open-ended, with no limit on depth, duration or frequency and no protection against later entrants, is difficult for a lender to underwrite; flexibility that is qualified, triggered by defined contingencies and bounded for the term of the agreement can be modeled, priced and financed. A published scoring matrix, coupled with qualification criteria for flexibility and defined service terms, allows BPA to serve more requests without diluting existing services, to show the region why each award is made, and to offer SPRINT customers power they can finance. By grounding site selection in data, publishing its selection

[1] See, e.g., *See, e.g.*, Sw. Power Pool, Inc., Docket No. ER26-1323 (June 5, 2026) (accepting SPP's Conditional High Impact Large Load Service (CHILLS), which provides non-firm transmission service to large loads for up to seven years, subject to curtailment when the system is constrained or in an emergency), *as described in* Ethan Howland, *FERC Approves SPP Non-Firm, Large-Load Transmission Service*, Utility Dive (June 8, 2026), https://www.utilitydive.com/news/ferc-spp-chills-large-load-transmission-service/822211/; A. Cory Lankford & Kayla Grant, *FERC Show Cause Orders Signal Broad Reform to Large Load Interconnection Policies*, Orrick (July 6, 2026), https://www.orrick.com/en/Insights/2026/07/FERC-Show-Cause-Orders-Signal-Broad-Reform-to-Large-Load-Interconnection-Policies (describing FERC's June 18, 2026 show cause orders directing each RTO/ISO to address, among other things, "[t]ransmission services for flexible large loads that are willing and able to adjust their use of the transmission system under certain conditions"); N.J. Data Center Fair Share Act (July 7, 2026) (requiring data centers of 50 MW or more to reduce load before residential customers when the grid is strained), https://www.nj.gov/governor/news/2026/20260707a.shtml; Utah S.B. 132 (2025) (directing the Public Service Commission to consider a "large load flexible tariff"), https://le.utah.gov/Session/2025/bills/enrolled/SB0132.pdf; Mich. Pub. Serv. Comm'n, Case No. U-22059 (Aug. 27, 2026) (approving DTE emergency procedures under which new customers of 500 MW or more lose power before other customers), https://www.michigan.gov/mpsc/commission/news-releases/2026/08/27/mpsc-approves-siting-settlement-on-ingham-county-solar-project.

criteria in advance, allocating capacity in proportion to the net-additional flexibility each project funds, and qualifying that flexibility from both sides of the meter under bounded, contingency-based obligations, BPA can connect large loads quickly, protect existing customers, and make SPRINT a model for other regions.

GridCARE appreciates BPA's leadership and looks forward to continued participation in this process.