



September 9, 2026

Bonneville Power Administration
By e-mail to: techforum@bpa.gov

Re: NIPPC/RNW Comments on BPA's Grid Access Transformation Future State Workshop on August 19, 2026

The Northwest & Intermountain Power Producers Coalition ("NIPPC") and Renewable Northwest ("RNW") submit the following comments in response to the Grid Access Transformation ("GAT") Future State workshop in August 2026 ("the Workshop").

I. Background

In May 2023, NIPPC and RNW released a white paper recommending that BPA consider a wide-range of reforms related to its transmission planning processes (the "White Paper").¹ We recognize that many of the BPA initiatives outlined in the workshop will address many of the recommendations set forth in the White Paper. For the benefit of stakeholders and BPA staff, a copy of the White Paper is attached to these comments.

II. Planning Process and Definitions

NIPPC and RNW appreciate the description of BPA's various planning processes. We remain concerned, however, that BPA's various planning processes remain heavily siloed. For each of the various transmission planning processes, BPA identified the frequency of how often those studies are undertaken (ranging from annually to once every three years). But there is no discussion of how the results of the annual processes inform each other or how annual processes feed into different processes that occur every two years or every three years. In future workshops, we would appreciate a more detailed explanation of how each of the various transmission planning processes work to inform each other – and most importantly on what timelines.

NIPPC and RNW suggest that BPA develop and publish a "planning roadmap" or planning

¹ Northwest & Intermountain Power Producers Coalition and Renewable Northwest, "BPA & the Grid the Northwest Needs" (White Paper, May 2023), <https://renewablenw.org/factsheets>.

integration framework. While BPA has published its Transmission Plans, BPA should consider developing a process map that explains how BPA arrives at conclusions across its various planning functions. For example, PJM, MISO, SPP, and CAISO all have multiple planning processes (reliability, economic, public policy, interconnection-driven, regional, inter-regional), and their planning roadmaps allow stakeholders to trace how one planning process informs another. As part of this planning roadmap, BPA would identify all planning inputs, outputs, assumptions, and decision points, show which studies are binding inputs to subsequent studies, and identify where stakeholders can provide input to assumptions or submit alternatives.

NIPPC and RNW also note with concern that BPA did not include several planning processes on its list – particularly regional planning under NorthernGrid, inter-regional planning coordination with CAISO and West-Connect, and the voluntary WestTEC study process. BPA participates in all these additional processes; these processes should be included in a comprehensive list of BPA's planning activities. A detailed process map that shows the interaction between all these planning processes will be important for stakeholders to consider, especially the coordination between the interconnection study processes (both Generator Interconnection and Line and Load Interconnection processes) and the commercial planning studies because participation in an interconnection process will be a requirement to participate in a commercial study in the future.

III. Commercial Planning

NIPPC and RNW largely agree with BPA staff in their identification of the challenges BPA faces in completing commercial planning studies. NIPPC and RNW also agree with staff's conclusion that BPA's current mechanisms for allocating transmission capacity are inefficient leading to a mismatch between the value of a queue position and the costs and risks associated with obtaining and retaining that queue position. Because the timeline to obtaining new transmission service on BPA's system has been long and uncertain, customers have had no option but to enter the transmission queue very early in their project development process. As a result, transmission access is potentially earmarked for speculative projects, the size of the queue is inflated, and both load and generation customers face uncertainty with the cost and timing of transmission access. To address these concerns, BPA identified several principles to pursue in reforming its processes for customers to access transmission service. We address each of them below.

A. Prioritize readiness over strict adherence to queue priority

NIPPC and RNW support this principle. Customers who are ready to take service should have access to transmission capacity. At the same time, BPA must adhere to its own timelines in making transmission service available to customers.

B. Mitigate Planning Impact of LSE Minimum Bid Requirements

NIPPC and RNW support this principle. BPA and its customers have long been aware that when Load Serving Entities (“LSEs”) initiate a procurement process they typically require bidders to have transmission rights in order to qualify to bid. The result is a flood of new transmission service requests, only a fraction of which will ultimately be required. This influx inflates the size of the transmission queue and has created significant challenges in completing studies on a timely basis. A solution to LSE minimum bid requirements in RFPs, however, seems largely outside BPA’s control. NIPPC and RNW have sought to educate state commissions on the impacts of minimum bid requirements for transmission rights and have made some progress in getting LSEs to accept conditional firm service as a viable minimum transmission requirement. Any solution to this principle will require continued coordination between LSEs, state commissions, and BPA regarding the nature of the transmission rights that will appropriately balance cost, timelines, and reliable load service. NIPPC and RNW look forward to further discussion of how BPA intends to work with LSEs, state regulators, and potential bidders or suppliers to address this issue.

C. Integrate Planning Queues/Studies to the Degree Possible

NIPPC and RNW support this principle. BPA suggests that the future commercial planning process should discourage speculative requests from entering the queue and should integrate BPA’s various queues for service. We interpret this to suggest that the Generator Interconnection processes, the Line and Load Interconnection processes, and BPA’s commercial studies of transmission service requests should be coordinated and not conducted in isolation from each other. We agree that there should be a coordinated process within BPA for transmission service (including a Commercial Study) when a new load (needing a Large Line and Load Interconnection) identifies a new generator (needing a Generator Interconnection). NIPPC and RNW look forward to a more detailed proposal for how BPA intends to integrate its various queues and study processes.

D. Align Financial Standards to Commercial Risk

NIPPC and RNW support this principle. BPA suggests that customers who request transmission service that triggers capital intensive transmission expansions should demonstrate they have the financial ability to meet their contractual commitments. NIPPC

and RNW recognize that the energy industry is capital intensive. In addition to the capital requirements associated with new generation, customers requesting transmission service must also have the financial ability to post security for upgrades and to take and pay for the service they have reserved. If a customer's request triggers a transmission expansion but the customer does not pay for the service they have requested, BPA's other customers will have to make up the shortfall through higher transmission rates. BPA must ensure that other transmission customers do not take on responsibility for covering the costs of upgrades for other customers. At the same time, BPA should not necessarily require customers to fully securitize upgrades and insulate BPA from all risk associated with transmission expansion. In many cases, transmission upgrades will provide a wide variety of benefits to multiple customers. In pursuing the GERP 1.0 and 2.0 projects, BPA did not require individual customers to fund the various studies underlying those upgrades; nor did BPA require customers who needed GERP 1.0 projects to provide security. NIPPC and RNW urge BPA to continue to evaluate transmission upgrades to determine the realistic commercial risk that BPA would face if a project were not fully securitized and develop an appropriate cost allocation mechanism for those upgrades. We do, however, urge BPA to develop a transparent decision-making framework that incorporates stakeholder input for future phases of GERP expansions.

E. Business Model Supports Regional Goals

NIPPC and RNW support this principle. NIPPC and RNW agree that customers who drive cost increases or benefit from transmission expansion should contribute to the funding of those upgrades. As noted above, however, many specific upgrades bring a wide range of benefits to both existing and new customers. For these cases, BPA should develop a transparent decision-making framework that incorporates stakeholder input in determining whether BPA should commit to a transmission upgrade where customers are not providing complete study costs or security. NIPPC and RNW believe that many transmission upgrades and expansions will provide multiple benefits to a broad range of customers over decades – in which case BPA should not require individual customers with new requests enabled by the upgrade to fully insulate BPA from any and all risk. At the same time, those customers with new requests should provide some appropriate level of financial commitment reflective of the service they receive. NIPPC and RNW look forward to working with BPA and other stakeholders to implement this principle in a way that balances all parties' costs and risks.

Additional Comments on Commercial Planning

We have observed two general perspectives among independent power producers and power marketers about reforms to BPA's commercial planning paradigm. Some firms are comfortable with the concept embodied within TC-27 where customers receive conditional firm service upon request with no certainty regarding the cost or timeline to bridge that service through upgrades in a commercial study. Other firms are reluctant to commit to take transmission service without a substantially detailed understanding of the costs and timeline necessary to fully bridge their service – in many cases, those BPA customers would prefer not to take conditional firm service at all but would prefer to await completion of transmission upgrades and only begin taking service when it is fully firm. For some firms this higher degree of cost and timing certainty is not just a preference but is necessary in order to secure financing for a project. These two different perspectives stem, in part, from natural differences in the industry regarding financial underwriting of projects and the assumption of transmission service risk. They are both valid. These two different perspectives reflect the opposite ends of a single spectrum of expectations regarding the appropriate level of risk and certainty that customers believe are appropriate for BPA.

At one end of the spectrum are customers who value early access to conditional firm service, are willing to accept significant uncertainty around future costs and/or timing of bridge service, and may be willing to remain on conditional firm service indefinitely. This concept largely arises out of the BPA proposals for service on demand from the summer of 2025 and in TC-27.

At the other end of the spectrum are customers who prefer certainty around the total costs and timing of bridge service (and recognize that this greater certainty would likely come at the cost of higher deposits and/or security collected at discrete milestones) over early access to a conditional firm service product subject to reassessment. This end of the spectrum was embodied in the BPA Network Open Season before it was replaced with TSEP and would likely consist of specific milestones with increasing levels of financial commitment from the customer at each stage, with increasing funds at risk the deeper into the process the customer's request for service proceeds.

NIPPC and RNW encourage BPA staff to develop a range of options along this spectrum for stakeholders' initial evaluation and feedback. As part of this effort, we anticipate exploring the benefits and challenges each option poses to BPA, transmission customers, and load serving entities. We anticipate that all options would have some elements in common, including study deposits and eligibility criteria. But options could differ in the timing of

service offers, the amount of deposits and security, the certainty around the customer's costs, the quality of service, and other respects.

IV. Accelerate Expansion

NIPPC and RNW support the proposal for a customer build option that allows customers the ability to engage their own consultants and contractors for design, procurement and construction of transmission facilities that BPA will own and operate. We recognize the necessity for customers to meet industry standards related to safety, reliability, and maintenance. At the same time, NIPPC and RNW encourage BPA implement the customer build option as quickly as possible. Many members have projects that must meet specific milestones in order to qualify for tax credits; delays in this program will jeopardize those projects. To that end, NIPPC and RNW encourage BPA to provide customers – well in advance of a final business practice -- with lists of approved design consultants, equipment standards, and construction contractors so that customers have the opportunity to engage in preliminary negotiation and potentially contracting activities with approved contractors and consultants as early as possible.

V. Rapid Access Products and Interconnection Delivery (“RAPID”)

NIPPC and RNW support the proposal to rapidly interconnect new large loads served by new behind the meter or co-located generation. While the proposal lacks detail, NIPPC and RNW generally support more rapid interconnection of both types – Line and Load Interconnections and Generator Interconnections. We anticipate that reforms in BPA's Line and Load Interconnection process would have to be balanced by similar reforms in the Generator Interconnection process – if only to speed development of behind the meter or co-located generation. We also encourage BPA to consider how reforms to implement RAPID (both load and generation) would tie into the principle under commercial planning to integrate BPA's various queue processes. We encourage BPA to provide a more detailed timeline for the development and implementation of RAPID, especially the anticipated timeline for any necessary tariff or rate processes.

VI. CONCLUSION

Thank you for the opportunity to submit these comments. NIPPC and RNW appreciate BPA's continued engagement with stakeholders on tackling these complex issues that are critical to the region's energy future. We look forward to collaborating further with BPA and other stakeholders on settlement or other productive resolution of these transmission reform issues.