



October 26, 2026

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

Re: NIPPC/RNW Comments on BPA's Grid Access Transformation Workshop on October 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 held on October 19, 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, NIPPC and RNW attached a copy of the White Paper to their Comments on BPA's August 2026 Workshop.

NIPPC and RNW agree with the need for condensed processes. BPA, its staff, and its customers have grown accustomed to implementing reforms through lengthy processes. The pace of change in the energy industry, however, has become much more rapid. BPA, its staff, and its customers must adapt to this increased pace of change. At the same time, stakeholders need sufficient time to review and consider BPA's proposals to provide useful input to BPA staff to allow them to make fully informed decisions.

PROCEDURAL TIMELINES

NIPPC and RNW appreciate the aggressive timeline for the reforms laid out during the Workshop. During the Workshop, BPA described three new proposals. Two of the proposals, SPRINT (Speed to Power Request for Interim Non-Firm Transmission) and PLAID

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

(Paired Load and Integrated Redispatch), are both part of the RAPID (Rapid Access Products and Interconnection Delivery) program. In the Workshop materials, RAPID and the Transition Process developed as part of the TC-27 are described as “Near Term” reforms. As discussed in more detail below, PLAID and SPRINT are intended to allow customers to achieve a rapid interconnection if they are willing to accept interruptible transmission service with no certainty regarding the cost and timing to achieve firm transmission service. Accordingly, NIPPC and RNW agree that BPA should implement these proposed reforms through an expedited process so that customers who value speed have access to SPRINT and PLAID as soon as possible.

The “Future State” encompasses the Proactive Planning process which in turn consists of three elements, 1) Expansion Planning, 2) Commercial Planning, and 3) Transmission Open Season. Previously, BPA has provided high level presentations on Expansion Planning. During the early stages of the TC-27 process BPA provided high level descriptions of how Commercial Planning might work in the Future State. During the Workshop, BPA introduced a new concept for the Future State – the Transmission Open Season. As discussed in more detail below, NIPPC and RNW support the high-level concept embodied by the Transmission Open Season. NIPPC and RNW, however, suggest that BPA develop the Transmission Open Season only in conjunction with the other elements of the Future State.

FUTURE STATE AND TRANSMISSION OPEN SEASON

The only element of the Future State discussed during the Workshop was the Transmission Open Season. BPA, however, cannot develop the Transmission Open Season in isolation. Customers must understand, consider, and provide comments on the Future State as a comprehensive package. At this point, it is not clear whether BPA intends the Transmission Open Season to be the sole mechanism for customers to obtain transmission service, or whether BPA will continue to provide an opportunity for customers to submit requests into the Commercial Planning process and the Open Season exists primarily to solicit potential commercial interest in creating additional capacity on upgrades BPA identifies through its planning processes. NIPPC and RNW note that throughout the TC-27 process, BPA intimated that the Future State would include a mechanism for customers to submit requests into a future Commercial Planning process.

For customers to have confidence that the Future State will meet their needs, BPA must articulate how it will conduct Expansion Planning and how customer requests will be considered in Commercial Planning. Only then can customers provide meaningful input into how BPA might conduct a Transmission Open Season. Accordingly, NIPPC and RNW

recommend that BPA delay consideration of any Transmission Open Season proposal until BPA begins the overall process to develop the other elements of the Future State.

For NIPPC and RNW to provide meaningful comments to BPA on a Transmission Open Season in the Future State, BPA must conduct workshops that address the following:

- Inputs for the Expansion Planning process;
- Indicative timeline for Expansion Planning (including the timeline for BPA build decisions);
- Customer eligibility requirements to participate in the Commercial Planning process;
- Inputs for the Commercial Planning process;
- Indicative timeline for the Commercial Planning process;
- Customer obligations as part of the Commercial Planning process, including the timing of customer financial commitments.

NIPPC and RNW encourage BPA to provide stakeholders with a timeline for workshops to develop these topics at the workshop in November.

NIPPC and RNW suggest that one of the greatest flaws of the TSR Study and Expansion Planning (TSEP) process, at least with respect to the spike in demand for transmission in recent years, has been a significant misalignment between the value and cost of a transmission service request. Much of the value of a position in the queue accrues to the customer as soon as the request is confirmed. The cost to enter the queue, however, is minimal. Subsequent study costs are also minimal relative to the value of the queue position. Only in the late stage of TSEP, at the point where BPA requires the customer to post security for the customer's share of transmission upgrades, does a customer incur significant costs. At each of these stages, however, the customer can exercise an off-ramp and incur no further costs or withdrawal penalties. NIPPC and RNW supported, and continue to support, BPA's Grid Expansion and Reinforcement Portfolio (GERP) under which BPA waives customer security requirements for transmission upgrades that meet BPA's criteria. An unintended consequence of GERP (specifically the waiver of security), when combined with the retention of the historical queuing mechanism for transmission service priority, has been to exacerbate the misalignment between the value and the cost to the customer. As a result, requests of a more purely speculative nature are able to socialize much of the cost and risk of their transmission requests to BPA's overall customer base while retaining all the value of the queue position throughout the study process and beyond (if the customer exercises all of its deferral rights).

While the full outline of the Future State is still to be determined, NIPPC and RNW urge BPA to approach the Future State with the goal of better aligning the cost a customer incurs at each phase of the process with the value to the customer. This fundamental misalignment has created a perverse incentive for purely speculative projects to stay in the queue with no real downside, to the detriment of other queue participants and the grid at large.

One obvious way to address this issue is to build mechanisms into Commercial Planning or Expansion Planning that depend more on load or load-serving entity commitments to take transmission service, rather than continuing to rely on supply-side or marketer commitments. Load-serving entities may be in a better position to evaluate the costs, risks, and benefits of flexible, interruptible, or conditional firm service than their generator suppliers, especially as load-serving entities consider adding new service to their existing portfolios of generation and transmission resources. For state-regulated load-serving entities, these mechanisms hinge in large part on alignment with state utility regulators and, if structured improperly, can generate their own perverse incentives for self-dealing by regulated utilities. NIPPC and RNW thus acknowledge that the various alternatives to queue priority have drawbacks of their own that require mitigation.

As described in our Comments to the August Workshop, 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 conditional firm 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. These two different perspectives stem, in part, from natural differences in the industry about financial underwriting of projects and the assumption of transmission service risk. They are both valid.

We suggest that it may be quite difficult to craft a single transmission service request process that will satisfy these two perspectives and business models. Instead, we encourage BPA to consider the merits of at least two separate paths for point-to-point customers to request transmission service for consideration in its commercial planning studies.

One path would appeal to 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.

A second path would appeal to customers who prefer certainty around the total costs and timing of bridge service over early access to a conditional firm service product subject to reassessment (this greater certainty would likely come at the cost of higher deposits and/or security collected at discrete milestones compared to the first path). This concept is similar to the BPA Network Open Season before it was replaced with TSEP. NIPPC and RNW are willing to work with BPA to flesh out both of these potential options as well as exploring additional alternatives. We anticipate that all options would have some elements in common, including study deposits and eligibility criteria. But compared to the first path, the second path would have more milestones with increasing levels of financial commitment at each stage and with increasing funds at risk the deeper into the process a request for service proceeds. We do not suggest that BPA should conduct separate commercial studies for each path; rather that both paths would allow entry – but on different terms – into a single commercial study process.

NIPPC and RNW remain open to ways to consolidate these paths into a single option, but suggest that the exercise of fleshing out these two options may be fruitful as a first cut.

NIPPC and RNW encourage BPA to move quickly to develop the Future State. While NIPPC and RNW recognize the value of the near-term reforms under RAPID that will allow expedited interconnection of load under certain conditions, the Future State is more important to most customers. While a small subset of customers may take advantage of the accelerated interconnection processes and long-term non-firm transmission services discussed below, most Network and Point-to-Point customers are awaiting clarity on the future process for them to request long-term firm transmission. NIPPC and RNW urge BPA to share a timeline for development of the Future State at the workshop in November.

RAPID (Rapid Access Products and Interconnection Delivery)

NIPPC and RNW support BPA's RAPID proposal. The program is likely to appeal to a small subset of load customers who value speed to interconnection and are willing to take on significant uncertainty related to the quality of their electric service for an indefinite period. NIPPC and RNW support giving New Large Load Customers the opportunity to interconnect and begin taking service in the near term if they are willing to take interruptible service. An important caveat to this support is that these new programs do not increase costs to

existing customers or delay other customers from obtaining transmission or interconnection service. NIPPC and RNW do recognize that BPA appears to be designing these programs to avoid cost or timing impacts to other customers. NIPPC and RNW also urge BPA to begin workshops to develop the Future State process under which BPA's load and generation customers can request and obtain firm service without committing themselves to an indefinite period of non-firm and interruptible service.

SPRINT (Speed to Power Request for Interim Non-Firm Transmission)

Under SPRINT, BPA would identify locations on its system that can support new large load interconnections. Load customers would have the opportunity to bid on those sites. NIPPC and RNW suggest the following elements of the evaluation criteria outlined in the SPRINT proposal are the most important.

- Time to energization (shorter is better);
- Estimated non-firm revenues (more is better);
- Requirement to advance all capital costs;
- Agreeing to take non-firm/fully interruptible service;
- Suitability for co-located generation (eligibility for PLAID);
- No reliability or commercial impact to other customers.

SPRINT will primarily appeal to customers who want a fast-track to interconnection and who are willing to take interruptible transmission service to achieve it. Not all customers, however, may be willing to accept that level of uncertainty. NIPPC and RNW do not object to BPA's development of SPRINT for that subset of potential customers, given the industrial race underway across the nation for computational power but encourage BPA to move expeditiously to develop a Future State process that provides new large loads with more certainty regarding the cost and timing of firm transmission service.

PLAID (Paired Load and Integrated Redispatch)

PLAID is a proposal to accelerate new load interconnection that is paired with co-located generation. NIPPC and RNW support the high-level description of PLAID that BPA shared during the Workshop. NIPPC and RNW agree that customers willing to make significant investments in load and generation should have the opportunity to fast-track those interconnections so long as they are willing to take non-firm service until transmission expansions enable firm service. NIPPC and RNW support BPA's reliability requirements, with some caveats:

- Resource and load connected at the same or electrically proximate BPA substation and voltage level;
- One load and one resource operator – although potentially including multiple electrically proximate resources owned by separate entities but managed by a single operator – all within BPA’s balancing authority area;
- Require no network upgrades beyond the interconnecting substation (other than system protection facilities)

BPA has proposed capping the capacity of the PLAID generator at or below the size of the load. NIPPC and RNW, however, support allowing the resource nameplate to exceed the load so long as the resource requests provisional interconnection service and purchases additional transmission service to inject energy to the grid. NIPPC and RNW suggest that there should be no limit on the nameplate of the generation associated with PLAID, but instead BPA should strictly enforce a net injection limit of 0 MW. We suggest that it is better for both system response and the maintenance of proper reserve margins if the capacity value of the PLAID generation facilities is sized larger than the load. Most generation facilities co-located with data center load will consist of a mix of generation assets (including batteries, renewables, and gas fired generation), along with fast response equipment (such as static synchronous compensators (STATCOMs) and power plant controllers (PPC)). In the event of a nearby reliability event, the combination of generation, batteries, STATCOM, and PPC would enhance system response including low voltage ride through, transient response, voltage recovery, and reactive power requirements.

Looking forward, this proposal may benefit from further refinements to increase its efficacy and improve system efficiency once BPA’s Day-Ahead Market decision crystallizes. Specifically, when BPA moves into a market with a centralized dispatch, the proposal’s assumptions around resources and load being connected at the same BPA substation (or electrically proximate) may be revisited. There is an opportunity for large loads that accept some level of flexibility or interruption to take service from generating resources with Energy Only Interconnection Service that similarly accept some level of curtailment and non-firm access to the transmission service on an “as available” basis. RNW and NIPPC look forward to further refining this concept with BPA and stakeholders as this and parallel processes unfold.

NIPPC and RNW agree with BPA that quarterly submission windows are reasonable. A cap of five requests per submission window also seems appropriate. NIPPC and RNW urge BPA to consider incorporating an open season process similar to SPRINT as part of PLAID. If customers submit more proposals than BPA can process, BPA should apply evaluation criteria (similar to those BPA applies to the SPRINT program) to the proposals submitted for

PLAID. Those proposals that score best under the evaluation criteria would be given priority.

NIPPC and RNW also support the readiness criteria that BPA outlined (site control; financial readiness; valid load interconnection; valid generator interconnection; permitting schedule; contractual commitment for resource to serve the load). NIPPC and RNW also support the requirement that any load draw from the grid be initially served with long-term non-firm transmission with an obligation to pursue a path to firm service in a future commercial planning process or open season.

RATE ISSUES

NIPPC and RNW agree that BPA should implement additional rates to support PLAID and SPRINT. BPA should develop both a long-term non-firm point-to-point rate and an ancillary services rate consistent with those outlined in the presentation.

VI. CONCLUSION

Thank you for the opportunity to submit these comments. NIPPC and RNW appreciate BPA's continued engagement with stakeholders in its search for creative solutions to the challenges facing 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. Most importantly, NIPPC and RNW urge BPA to move forward with development of the Future State reforms.