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Comments on BPA's October 19, 2026 GAT: RAPID and Transmission Open Season BP/TC-27R Pre-Proceeding Workshop

Portland General Electric (PGE) supports Bonneville Power Administration's (BPA's) objectives of improving transmission utilization, accelerating service to commercially viable customers, and generating incremental revenue that may reduce pressure on transmission rates. BPA should prioritize any and all efforts to optimize use of the transmission system during this period of constraint until significant transmission expansion is placed into service (e.g. Grid Expansion and Reinforcement Portfolio (GERP) 1.0 and 2.0). The proposed reforms could also help BPA address speculative requests and extraordinary growth in large-load demand.

PGE's objective is not only to preserve existing transmission rights, but to ensure that BPA's reforms create a timely, affordable, and durable pathway to the additional transmission needed to serve customers reliably, integrate new resources, and meet applicable clean-energy and resource-adequacy obligations. Accelerated access for new large loads should complement—not displace or delay—service to existing requests and broader system expansion.

RAPID (Rapid Access Products and Interconnection Delivery) and the Transmission Open Season would introduce consequential changes to how BPA identifies, prioritizes, prices, and allocates transmission capacity. BPA should not implement these mechanisms until it has protected existing transmission customers, established transparent allocation and cost-assignment rules, and provided a stakeholder process consistent with the commitments and principles established in TC-20. BPA should evaluate these reforms against measurable outcomes for transmission availability, deliverability, affordability, and execution across customer classes.

1. Protect existing transmission customers and service obligations

BPA should demonstrate that SPRINT (Speed to Power Request for Interim Non-Firm Service), PLAID (Paired Load and Integrated Dispatch), the proposed Long-Term Non-Firm product, and Open Season process will not degrade the quality of existing long-term transmission rights. BPA should also describe how potential new Conditional Firm



transmission service offers will impact or be impacted by RAPID and the proposed Transmission Open Season.

At the October 19 workshop, BPA indicated that SPRINT customers could be curtailed at North American Electric Reliability Corporation (NERC) Priority 5, under N-0 and N-1 conditions, but did not fully define whether or how this is consistent with North American Energy Standards Board (NAESB)/NERC standards. BPA also indicated, in the Venn diagram on slide 19, that PLAID customers could be offered Interruptible Non-Firm transmission service which would likely be consistent with NERC computational load standards, but the technical details are still to be defined. Full technical details are required before informed customer comments can be provided on that part of the proposal.

PGE recommends that BPA:

- Demonstrate that SPRINT and PLAID awards will not impair existing Long-Term transmission service rights and how these awards are anticipated to impact Short-Term transmission capacity availability.
- Describe how affected transmission systems will be identified and coordinated with neighboring transmission providers and balancing authority areas.
- Address both contractual non-impairment and operational impacts on existing customers, including, where applicable under governing tariffs and agreements, renewal and rollover rights, redirects, assignments, resource substitutions, Short-Term capacity availability, and Conditional Firm curtailment exposure. Assess deliverability during stressed hours and simultaneous regional demand, rather than relying solely on unchanged reservation quantities.
- Define the relative priority and curtailment order for each new service product in each process (i.e., describe details of the products to be offered in SPRINT and PLAID).
- Define and study how enabling additional transmission services might impair and impact other lower priority non-firm products, including but not limited to, daily, weekly and monthly products and hourly non-firm redirects.
- Provide quantitative or qualitative system-impact information before selecting candidate SPRINT sites or awarding service.
- Preserve existing customers' rights to seek additional Long-Term Firm transmission service and avoid providing SPRINT or PLAID customers an implied preference over future transmission requests.



2. Define “remaining” transmission capacity to be awarded through Transmission Open Seasons

BPA should not conduct an open season or auction until it establishes a transparent, repeatable methodology for determining the capacity eligible for allocation, how existing rights are reflected in this methodology, and if/how future needs are reflected in “base assumptions” mentioned on slide 56.

PGE recommends that BPA specify:

- The study assumptions, operating horizons, contingencies, and reliability criteria used to calculate available capacity.
- How the Transmission Open Season relates to Expansion Planning and/or Commercial Planning processes.
- How BPA will account for both trended and non-trended NITS load forecasts, existing transmission rights, Conditional Firm service, resource additions, queue requests, and future PTP needs.
- How forecast load growth, replacement generation, clean-resource procurement, storage charging and discharge, and capacity imports needed for resource adequacy will translate from planning assumptions into a workable opportunity to obtain transmission service.
- Associated service-request procedures, timing, and necessary expansion without creating an undisclosed preference for any customer class.
- How frequently BPA will recalculate available capacity.
- What happens if subsequent studies identify less capacity than BPA initially awarded.
- What supporting data BPA will provide so customers can evaluate its conclusions, subject to appropriate confidentiality and security protections.

BPA should complete this methodology before identifying the quantity of capacity offered through SPRINT or establishing any auction reserve price.

3. Establish transparent and nondiscriminatory award criteria for SPRINT Open Season

BPA must convert its proposed evaluation criteria—including operational flexibility, equipment lead times, length of commitment, net-present-value revenue, willingness to advance capital, and progressive forfeiture milestones—into objective and reviewable standards.



PGE recommends that BPA:

- Define how BPA will determine the highest value proposals and publish the scoring methodology, criterion weights, eligibility thresholds, tie-breaking rules, and award process before publishing the FRN to initiate the TC-27R proceeding.
- Distinguish criteria measuring project readiness from criteria intended to maximize BPA revenue.
- Define whether customers will be treated differently based on their status as Load Serving Entities, Generation Developers, Marketers, or Wheelers.
- Provide comparable participation pathways for eligible arrangements submitted directly by large loads or through their serving utilities, including utility-arranged generation, contracted supply, storage, and aggregated flexibility where those arrangements satisfy the applicable technical and operating requirements.
- Document the basis for each award.
- Establish a process for correcting factual errors and disputing eligibility or scoring determinations.
- Publish aggregate results following each process, including capacity offered, capacity awarded, clearing prices, and the principal selection factors.

Revenue generation may be a legitimate consideration, but it should not become a substitute for open-access principles or a mechanism through which customers obtain preferential access solely because they can pay a premium.

4. Assign customer-specific costs and risks and allocate shared network costs transparently

PGE supports BPA's stated principle that data centers and other large loads should pay their individual costs rather than shift those costs to existing ratepayers. BPA identified direct assignment, upfront operations and maintenance recovery, and stranded-cost protections as potential mechanisms, but the details remain unresolved.

PGE recommends that participating customers be responsible for:

- Customer-specific interconnection facilities, studies, environmental review, metering, telemetry, telecommunications, and other directly attributable facilities and costs, together with their properly allocated share of network upgrades under transparent cost-causation and beneficiary-based principles.



- Incremental operating, scheduling, balancing, congestion, redispatch, and administrative costs attributable to their service.
- Costs arising from delay, withdrawal, downsizing, early termination, or failure to transition to firm service.
- Stranded investment resulting from a customer's failure to take or maintain the service requested.

BPA should require adequate financial security, milestone-based deposits, progressive forfeiture provisions, and durable minimum payment obligations. Any interruption credit should reflect the value of service BPA did not provide without transferring project or commercial risk to other transmission customers.

For network upgrades serving multiple users or providing broader system benefits, BPA should distinguish customer-specific obligations from shared investment and apply transparent cost-causation and beneficiary-based allocation principles. BPA should define appropriate crediting or reimbursement for customer advances and subsequent beneficiaries, prevent double recovery, and ensure that advancing capital does not purchase undisclosed transmission-service priority.

5. Clarify the service product and curtailment framework

Under the workshop proposal, SPRINT customers could receive annually renewed Long-Term Non-Firm service that is interruptible under both N-0 and N-1 conditions. The proposal also contemplates interconnection upgrades during 2030–2032 and an eventual transition toward firm service.

PGE recommends that BPA define:

- The conditions triggering curtailment and the order in which customers will be curtailed.
- Whether annual renewal is discretionary, how and when such renewal is initiated, and whether an initial award creates any expectation of continued service.
- The methodology for calculating interruption credits.
- The studies, financial commitments, and upgrade requirements necessary to transition to firm service.
- Whether a “path to firm” confers any reservation, priority, or preference over other requests.



- The consequences if upgrades are delayed, become uneconomic, or cannot be completed.
- Whether and under what conditions the service may be transferred, redirected, assigned, or resold.

The tariff should state expressly that interim non-firm service does not create an implied firm right. Firm service should arise only after BPA completes the applicable studies, identifies and funds the required upgrades, and executes the appropriate service agreement.

The absence of an implied firm right should be paired with a credible, documented pathway to firm service for existing requests and new participants under transparent, nondiscriminatory rules. BPA should identify enabling upgrades, study and funding requirements, dependencies, and accountable milestones; explain how delays change service expectations; and report progress without implying a guaranteed service date before the necessary commitments are in place.

6. Integrate RAPID and Transmission Open Season with transmission and load planning

BPA should provide a unified explanation of how SPRINT and PLAID projects will enter its planning process and interact with ten-year load forecasts, high-priority transmission projects, generation expansion planning, and existing transmission requests. The workshop described different treatment for loads above and below 50 MW, PLAID projects taking long-term non-firm service, and SPRINT awardees, but several aspects remained unresolved.

BPA should also provide an explanation of how a Transmission Open Season fits into BPA's broader commercial planning efforts.

PGE recommends that BPA:

- Provide in each GAT workshop, regardless of which topics or unique workstreams will be discussed, a single timeline for the entire GAT scope, inclusive of the Transition Study, Evaluation Criteria, Queue Management, Conditional Firm Service, PLAID, SPRINT, Expansion Planning, Commercial Planning, Transmission Open Season, as well as the Accelerate Expansion workstreams.
- Publish an integrated expansion implementation roadmap identifying enabling upgrades; responsible parties; and study, funding, procurement, permitting, and



construction milestones. Report progress and material delays, explain impacts on service expectations, and demonstrate that accelerated large-load work will not divert staffing, equipment, or construction resources from previously committed projects.

- Explain what loads and generators will be modeled in the base assumptions.
- Explain when, and at what confidence level, a proposed large load will be included in planning models.
- Prevent speculative or contingent projects from prematurely driving network investments paid for by other customers.
- Establish rules for removing delayed, reduced, or canceled projects from planning assumptions.
- Explain how geographically concentrated large-load awards will affect regional transfer capability and transmission expansion needs.
- Coordinate with affected neighboring transmission providers and balancing authorities to assess end-to-end deliverability, affected-system constraints, simultaneous transfers, and extreme weather conditions. Identify the limitations of each proposed service product for applicable resource-adequacy and market-delivery requirements; do not assume that an award on BPA's system establishes deliverability across the complete transmission path.
- Coordinate load and generation assumptions so that co-located generation receives no planning credit beyond its demonstrated operational contribution.
- Define the relationship between SPRINT and PLAID awards, existing queue requests, Conditional Firm Service, and BPA's broader transmission-planning reforms.
- Define how customers will gain transmission rights for their needs reflected in base assumptions.
- Provide a diagram or process-flow describing how Proactive Planning, SPRINT, PLAID, and the Transmission Open Season will inform each other.
- Publish a screening and delivery plan for operational improvements, reconductoring, grid-enhancing technologies, and targeted upgrades that could make additional capacity available before major expansion is completed. Identify evaluation criteria, implementation milestones, verified capacity benefits, costs, and transparent rules for allocating the resulting capacity.



7. Refine PLAID eligibility and operating requirements

PGE supports a durable pathway for commercially ready load-generation combinations when co-location provides verifiable transmission benefits. Physical proximity alone, however, does not establish that a generator will offset load or reduce network impacts under stressed operating conditions.

PGE recommends that BPA:

- Define the proposed “electrical proximity standard” using objective technical criteria.
- Clarify whether eligibility requires common ownership or permits enforceable contractual supply and flexibility arrangements. Apply equivalent technical and operating standards to utility-sponsored and directly submitted configurations, and recognize contractual arrangements that demonstrate equivalent operational benefits rather than relying solely on ownership structure or commercial form.
- Clarify whether generator sizing refers to nameplate, accredited, expected, scheduled, or maximum output.
- Specify scheduling, metering, telemetry, outage coordination, and dispatch requirements.
- Explain how the proposed five-year self-supply commitment will be monitored and enforced.
- Define the treatment of generator outages, resource underperformance, ownership changes, PPA termination, and load-generation imbalances.
- Demonstrate the system benefit attributable to each PLAID configuration.
- Explain the technical basis for requiring the resource and load to operate in the same balancing authority area.
- Describe how withdrawn requests will impact the studies and remaining study participants.

8. Demonstrate that the TC-27R timeline honors TC-20 commitments

PGE is concerned that the current TC-27R timeline may not allow BPA to honor applicable TC-20 commitments and procedural safeguards for developing tariff-related changes.

The TC-20 settlement adopted a Terms and Conditions six-step process to update BPA’s Open Access Transmission Tariff (OATT) and an associated Business Practice update process. These processes are intended to facilitate transparent exchange regarding



changes to BPA's OATT and Business Practices via specified workshops, comment consideration, transparent data, and customer-facing implementation steps for several tariff and business-practice reforms.

At the October 19 workshop, BPA indicated that RAPID may require at least one new tariff attachment, new rate schedules, and potential changes to the body of BPA's OATT, and identified a November 18 stakeholder workshop, a December 2026 initial proposal, January 2027 direct cases, February rebuttal, a March Hearing Officer recommendation, and an April final Record of Decision. PGE assumes BPA will also require new or updated Business Practices.

PGE has separately advocated for a more robust public process for BPA transmission-planning reforms, including transparency regarding timelines, planning assumptions, and methodologies, as well as written responses to customer comments (see [PGE's May 6, 2025 presentation](#)).

Given the scope of the proposed changes and the lack of detail provided during the October 19 workshop regarding process design and implementation, a November workshop followed immediately by a December initial proposal may not provide enough opportunity for BPA to publish concrete tariff language and methodologies, receive informed comments, consider and respond to those comments, and refine its proposal before formal litigation begins. RAPID and the Transmission Open Season may introduce new service products, allocation mechanisms, curtailment priorities, and cost responsibilities with significant implications for existing transmission customers. These are substantive matters that require review of concrete tariff language and supporting methodologies, not solely discussion of high-level concepts.

PGE requests that BPA demonstrate how its proposed process honors applicable TC-20 commitments. If BPA cannot complete the necessary stakeholder development under the current schedule, BPA should extend or restructure TC-27R rather than compress development of the proposal into the litigated proceeding.

PGE recommends that BPA:

- Identify the TC-20 commitments and procedural requirements applicable to RAPID and the Transmission Open Season.
- Explain how the current TC-27R schedule will satisfy those commitments.



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- Clearly distinguish changes requiring tariff amendments from matters appropriately implemented through business practices.
- Publish draft tariff language, rate schedules, business practices, and technical methodologies before issuing the initial proposal.
- Provide customers with a meaningful opportunity to comment on actual language rather than only high-level concepts.
- Respond in writing to material stakeholder comments and explain whether and how BPA's proposals changed.
- Hold at least one technical workshop after customers have had an opportunity to review the draft provisions.
- Avoid deferring foundational policy decisions to litigation when those issues should be addressed through pre-proceeding stakeholder development.
- Extend or restructure BP/TC-27R if BPA cannot complete the applicable stakeholder process before issuing its initial proposal.
- Identify any TC-20 commitment BPA concludes is inapplicable and provide the basis for that conclusion.

9. Sequence implementation carefully

BPA should not award service before the governing rules are final. The current concept anticipates a spring 2027 Transmission Open Season and awards by September 30, 2027.

BPA should distinguish reversible analytical work and technical validation, which can proceed while rules are developed, from binding awards or durable commercial preferences, which require final governing rules. A tightly bounded pilot should proceed only after applicable customer protections, cost responsibility, monitoring, expiration, and no-precedent provisions are established; it should not create implied renewal rights or firm-service priority.

PGE recommends that BPA sequence implementation, as follows:

1. Finalize the methodology for calculating available capacity, including how existing transmission rights, expected Conditional Firm Service offers, and anticipated SPRINT and/or PLAID offers will be reflected in the base assumptions.
2. Adopt the tariff provisions and rates governing the new service products.



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3. Complete associated business practices and operating procedures, including how withdrawals will be managed.
4. Establish cost-assignment and financial security requirements.
5. Publish the evaluation methodology, reserve price, and award rules.
6. Confirm protections for existing transmission customers.
7. Only after the above are completed should BPA initiate binding SPRINT awards, accept PLAID service commitments, or initiate a binding Transmission Open Season allocation process. Nonbinding analytical work and technical validation may proceed earlier consistent with the safeguards described above.

Conclusion

PGE supports BPA's effort to replace speculative queue activity with processes that prioritize commercially ready customers and optimize use of the federal transmission system. To realize those benefits, BPA must establish objective capacity calculations, preserve existing customers' rights and quality of service, apply transparent and nondiscriminatory award criteria, and ensure that participating large loads bear customer-specific costs and risks and their properly allocated share of shared network costs. The reforms should also provide workable pathways for future resource delivery and utility-sponsored participation, supported by an accountable expansion roadmap and coordination that establishes end-to-end deliverability.

Just as importantly, BPA must provide the process necessary to develop durable tariff rules. PGE recommends that BPA demonstrate how the TC-27R schedule honors applicable TC-20 commitments and extend or restructure the proceeding if the current timeline does not allow meaningful review of the actual tariff, rate, business-practice, and technical provisions. BPA should resolve these foundational matters before implementing RAPID or a Transmission Open Season.

Finally, PGE urges BPA to continue to advance the efforts related to GAT Accelerate Expansion and to bring the GERP projects online as quickly as possible.

Respectfully,

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