SNOHOMISH COUNTY PUD
PUBLIC UTILITY DISTRICT NO. 1

Energizing Life in Our Communities

October 26, 2026

Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208

Via email: techforum@bpa.gov

RE: Comments regarding BPA's RAPID Program, including SPRINT and PLAID

Thank you for the opportunity to comment on the Bonneville Power Administration's (BPA) newly proposed transmission initiatives under the RAPID umbrella. Snohomish appreciates BPA's willingness to explore new ways to approach transmission interconnections and bringing new loads online while keeping existing customers protected under its "Ratepayer Protection Pledge."

Snohomish Encourages BPA to Ensure the Ratepayer Protection Pledge Remains Effective

As BPA continues to consider these new programs, Snohomish encourages BPA to ensure that the Ratepayer Protection Pledge covers not only the directly assigned costs of large load interconnections, but all ancillary costs that may arise from these large loads entering the system consistent with cost causation principles. System upgrades, reinforcements, and other work could be necessary but unforeseen consequences of large load interconnections. Costs not properly allocated to the large loads responsible would be inconsistent with the Ratepayer Protection Pledge and cost causation principles resulting in increasing costs for Network customers.

Snohomish encourages BPA to take a more rigorous look at its methodology for directly assigning the costs associated with its SPRINT and PLAID programs to account for ongoing or unexpected costs. For example, BPA notes (at slide 53) that its leaning for the new firm rate would include direct assignment of all capital and operations and maintenance costs, and that any "remaining costs" would be recovered through rate base. BPA lists several options on how that rate base recover could occur. We encourage BPA to expand the options for such a rate base methodology to include segmentation analysis, conditional direct assignment, or other rate constructs.

BPA's SPRINT Bidding Framework Should Reduce Risks and Maximize Public Benefits

Snohomish agrees with BPA (at slide 54) that the challenges around using actuals vs forecasts and stranded costs are mitigated by more direct assignment or upfront O&M. To this end, there may be an opportunity in setting bid floors for SPRINT awards such that indirect network cost impacts are more likely to be addressed in bids upfront, and that high clearing prices have the potential to bring in

revenue volumes that may have the effect of lowering existing costs for existing customers. The details in evaluation of system impacts, ensuring system impact costs are recovered and the framework for which bids are solicited and evaluated will likely determine whether the framework is able to meet or exceed the Ratepayer Protection Pledge and Snohomish looks forward to further details in future workshops that will address these needs.

Finally, we want to highlight that any final proposal adopted by BPA should be consistent with BPA's statutory obligations including providing preference power to utilities like Snohomish at rates as low as possible consistent with sound business principles and that no adverse impact on regional resource adequacy will occur as a result.

Snohomish looks forward to continuing engagement with BPA on these new programs.

Sincerely,

Ian Hunter
Transmission and Policy Analyst