

October 26, 2026

BONNEVILLE POWER ADMINISTRATION

Re: BP/TC-27R Pre-Proceeding Workshop #1, October 19, 2026

Tacoma focuses our comments on “fatal flaws” as requested by BPA. We address these issues below by program.

SPRINT: Load serving entities often rely on BPA’s short term transmission market to serve load and market surplus power. If Bonneville awards up to five GW of priority five long-term non-firm PTP it may severely decrease the amount of short-term PTP available to Tacoma and other LSEs. Tacoma and other transmission customers will struggle to balance the grid and market power in the real-time timeframe. Tacoma strongly encourages Bonneville to account for the need of transmission customers to be able to move power in the short-term market for reliability purposes.

PLAID: Tacoma asserts there needs to be a minimum requirement of generation to load ratio in order for an applicant to be considered, because otherwise it negates the entire value proposition of PLAID. Tacoma suggests a minimum ratio of approximately 65%. Without a high minimum ratio BPA could be introducing reliability issues into the transmission grid.

RAPID Overall:

1. The proposals for large load interconnection are only discussed in the context of BPA’s balancing authority. How (if at all) do any of these initiatives apply to a load serving entity that is a transmission customer of BPA but has their own balancing authority?
2. In the Q&A BPA states that the RAPID program will run in parallel to the existing interconnection process that will remain unchanged. Tacoma sees this as highly problematic as the interconnection process doesn’t exist at all today because BPA stopped processing the queue about three years ago, which is what started TC-27. Now it seems that BPA will have two parallel products SPRINT and TC-27 offering (in fact requiring) a path to firm, how does BPA then prioritize transmission project builds aimed to convert conditional/non-firm to firm service and who gets that award of firm service first?
3. Similarly, if TC-27 does not proceed, what does Bonneville anticipate awarding in the next two years?
4. How does RAPID align with BPA only planning to build transmission to its obligations? If BPA is requiring a large load to take firm service to participate in RAPID, does it not then incur an obligation to build for that service?

Transmission Open Season:

- 1) There is a lack of clarity to what extent TC-27 will continue and how it will engage with an open season proposal, but Tacoma would like to see BPA continue to honor the TC-27 settlement language that allows a customer to change transmission service products until 2031, regardless of what happens to other sections of the settlement.
- 2) Tacoma is looking for some more clarity on this program and is anticipating that more details will be provided during the next workshop on November 18th. Specifically, we are hoping for more information on how this integrates (or doesn't) with the existing processes for determining builds and awarding TSRs.
- 3) There are conflicting responses in the Q&A as to what counts as "base case" and therefore is considered a part of BPA's obligation. Question 58 indicates that criteria is under development still but will consider multi-user needs, question 89 says planning will include a buffer for regional growth, question 101 states that PTP customer growth will not be accounted for, question 98 says everything under 50 MW counts as base case, while question 106 says the base case is based on WestTEC data assumptions. Tacoma finds these vacillating answers concerning and wants to establish that first and foremost BPA needs enough transmission to serve its preference customer load, regardless of whether that customer takes transmission service as PTP or NTS.
- 4) In terms of transmission capacity limits, 50 MW is an arbitrary threshold for capacity amount for open season. There could be many valid reasons a transmission request would be that large that would fall under BPA's "obligation". For example, a new dedicated resource that could decrease Tier 1 or Tier 2 requirements. Conversely, there are many use cases where an entity would want to bid a TSR under 50 MW, such as surplus capacity. Without a clear understanding of what BPA's obligation to build is, what would be in Open Season is hard to determine at this stage. Subsequently, Tacoma urges BPA to ensure that there are protections for Load Serving Entities in any Open Season framework. Residential and small/medium commercial customers would suffer in terms of rates and reliability should LSEs be constantly outbid by hyperscalers for transmission access.

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