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TEMUS Comments on RAPID and Transmission Open Season Workshop October 19, 2026

TransAlta Energy Marketing (U.S.) Inc.'s (TEMUS) comments are in response to the Bonneville Power Administration's (BPA) stakeholder workshop held on October 19 to introduce the RAPID programs, PLAID and SPRINT, and to introduce the Transmission Open Season initiative under the Proactive Planning program. TransAlta appreciated BPA's quick action to publish Q&A from the workshop, which helped focus these comments.

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

On slide 22, BPA describes their intent to identify "already existing unused capacity" at "strong sites".

- What criteria does BPA plan to use to make this assessment?
- How far from the candidate substation will transmission facilities be included in the evaluation?

Using the diagram on slide 22, we believe unused capacity refers to the substation itself (the red portion) as opposed to transmission paths further downstream on BPA's system, away from the substation. Is that correct?

If not, TEMUS contends that as BPA assesses unused capacity, the volume of day-to-day load being served using non-firm service must be considered, simply because firm service, even short-term firm, is scarcely available. Not via original transmission service requests, not through redirects, and rarely from the secondary market (resales).

Why this matters: At earlier stakeholder forums including Proactive Planning, TEMUS commented that usage data and BPA Operations must help identify problem flowgates that are natural contenders for immediate, no-regrets upgrades. These often show negative ATC or experience hourly sales stoppages. Until Proactive

Planning facilities actually become energized, however, we are concerned that SPRINT could exacerbate problems serving load in the day-ahead and real-time markets today, depending upon how BPA assesses unused capacity.

Paired Load and Integrated Dispatch (PLAID)

We believe PLAID partially avoids the concerns described above because load must be paired with generation. However, please confirm that the "BPA-approved electrical proximity standard" will exclude transmission facilities already experiencing excessive flow, like a problem flowgate mentioned above.

From slide 39, please explain Eligibility Reliability Requirement (c) that is described as "one load and one resource operator in the same BAA". It is unclear if a resource and load *interconnected* on BPA's system would qualify under this requirement. If the same Balancing Area Authority is meant, please explain the reasoning for this requirement.

Transmission Open Season

Two questions from slide 56: Please provide a practical example of "capacity remaining after base assumptions". Does BPA mean headroom available after accounting for the expansion's main drivers, such as reliability and whatever else caused it to be built?

Was the Transmission Open Season initiative created due to an analysis that suggests excess capacity is likely after Proactive Planning? If so, please share that assessment or any insights about BPA's early considerations.

Yours truly,

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