

COMMENTS OF THE WESTERN PUBLIC AGENCIES GROUP REGARDING GAT: RAPID AND TRANSMISSION OPEN SEASON

Submitted: October 26, 2026

The Western Public Agencies Group (“WPAG”) submits these comments following BPA’s GAT: RAPID and Transmission Open Season workshop held October 19, 2026 (the “October 19th Workshop”).

At the October 19th Workshop, BPA introduced its transmission customers and other regional stakeholders to its Rapid Access Products and Interconnection Delivery (“RAPID”) initiative. The goal of RAPID is to interconnect large loads as soon as possible while minimizing the financial impacts on traditional ratepayers. RAPID includes two main components: (1) Speed to Power Request for Interim Non-firm Transmission (“SPRINT”) and (2) the Paired Load and Integrated Dispatch (“PLAID”) program.

The goal of SPRINT is to use a one-time open season process to connect approximately 5 GW of hyperscale data centers onto the BPA’s 500 kV grid as quickly as possible using existing unused capacity. The highest value proposals in the open season would be provided non-firm interruptible service immediately with a path to eventually receive long-term firm service.

Under the PLAID program, BPA proposes a fast-track interconnection process for large loads with co-located generation where the generation has committed to serve the large load.

While RAPID, SPRINT, and PLAID appear to still be in their formative stages, the October 19th Workshop was nonetheless the first of only two workshops that BPA plans to hold to discuss the initiatives before its commences in December (1) an expedited 7(i) tariff proceeding to amend its Open Access Transmission Tariff (“OATT”) to include the SPRINT and PLAID programs; and (2) an expedited 7(i) rate proceeding to establish new transmission and ancillary service rates for SPRINT and PLAID implementation. BPA intends to complete the two expedited hearings by April 2027 with service starting for SPRINT in late 2027 and for PLAID in early 2028.

BPA provided one week from the October 19th workshop to provide comment. Given the short timeline, WPAG offers the following summary comments:

1. **BPA needs to slow down if it wants to go fast.** It was evident at the October 19th Workshop that BPA is assembling RAPID, SPRINT, and PLAID in flight and that customers are unlikely to see a complete proposal until BP-27R and TC-27R are initiated in December. BPA’s transmission customers have fundamental load service, reliability, rate, and commercial interests implicated in and dependent on BPA’s existing OATT. BPA’s slapdash timeline, with only one of two pre-case workshops remaining before it starts an accelerated formal process to significantly modify its OATT, signals that it does not respect or take those interests seriously. Customers do not know what BPA’s proposals will mean for their existing transmission rights or their future transmission needs, and this is because BPA has not taken the time to explain it. This dynamic is already putting customers on the defensive to protect their interests,

perhaps unnecessarily. A longer pre-case workup with more workshops is necessary to help both BPA and its customers to better understand what BPA is proposing and its potential impacts, as well as to provide opportunities to informally resolve any concerns outside of litigation. This would be much more likely to produce a better overall outcome with more buy-in within the region. Further, while it may not resolve all issues for all parties, such an approach has been proven in the past to reduce the number of litigants and litigated issues both in the relevant BPA proceeding and upon any appeal.

2. **BPA must demonstrate that SPRINT will not undermine its ability to meet its power marketing obligations to its preference customers.** BPA is required to ensure that it has sufficient rights to capacity on its transmission system to meet its current and future power marketing obligations before making any excess capacity available to utilities on a fair and non-discriminatory basis.¹ BPA can provide transmission services for non-federal uses so long as it does not interfere with its power marketing program, applicable operating limits, or existing contractual obligations.² BPA's power marketing obligations include BPA's load service obligations to preference customers under their §5(b) power contracts. Under their BPA power contracts, BPA's load following ("LF") customers assigned their 6NN secondary transmission rights under their BPA NITS agreements to BPA power services for BPA to use to meet their loads. LF Regional Dialogue Contract, Ex. F, §2(2); LF Provider of Choice Contract, Ex. F, §2(2). BPA's planned product customers likewise use their 6NN rights for load service. A question that was asked but not answered during the October 19th Workshops is what impact, if any, would BPA's proposal to award 5 GW of long-term non-firm transmission service under SPRINT have, on both the long and short-term basis, on the availability of the 6NN transmission that BPA power services uses to serve the §5(b) loads of its preference customers. BPA must answer this question, and in a manner in accordance with its statutes, before moving any further in its development of SPRINT.
3. **BPA must explain how it intends to staff the new initiatives.** BPA's transmission planning process has effectively been on pause for over two years. Its planning staff is limited and already stretched thin by the daunting size of its line and load, transmission, and generation interconnection queues. Due to federal salary limits, BPA has difficulty retaining and hiring new technical staff. Accordingly, as BPA moves forward with the RAPID initiative, it should explain how it intends to staff the project. And, if BPA intends to use current staff, it should further explain what work will be placed on a lower priority, or not done at all, so that BPA's aggressive timeline for implementing the RAPID initiatives can be met.
4. **PLAID shows promise.** Notwithstanding our concerns above, we acknowledge that co-locating loads and resources through programs like PLAID presents a significant and important opportunity to help address the region's transmission and load service constraints. We look forward to learning more.

¹ Transmission System Act § 6; Preference Act § 6; *CEC v. BPA*, 909 F.2d 1298, 1312 (1990).

² Northwest Power Act § 9(i)(1)&(3); *CEC v. BPA*, 909 F.2d 1298, 1312 (1990).