

Comment Letter on BPA's Transmission Planning, Queue Reform Initiatives & TC-27

On behalf of a coalition of electric utilities and other Point-to-Point (PTP) transmission service customers, we appreciate the opportunity to comment on Bonneville Power Administration's (BPA) proposed transmission planning reforms and future state vision and TC-27.

We support BPA's efforts to modernize its transmission planning framework, particularly the mechanisms proposed to be implemented to clear the existing transmission queue and enable timely and effective transmission studies, so long as those steps are implemented equitably and do not favor one class of queued projects over another. These steps are critical to facilitating the development of new transmission infrastructure and ensuring reliable service across the region.

However, stakeholders require and are requesting additional information regarding the proposed Conditional Firm (CFS) Interim Service product before we can offer full support. Understanding how this product aligns with WRAP obligations is essential for utilities participating in the WRAP program assuring Resource Adequacy for all the customers we serve. While BPA has stated that it does not intend to reduce the ability of CFS service to deliver transmission consistently, it is difficult to accept at face value as BPA has announced a plan that would not "firm up" CFS awards. Additionally, BPA appears to indicate an intent to award more CFS at the expense of firm transmission service.

We also seek clarity on redispatch protocols, particularly given the potential scale of interim service—up to 60 GW of requests in the current queue. The increased likelihood of redispatch raises concerns about operational reliability and cost implications, which must be addressed transparently. Traditionally PTP service has not been subject to redispatch protocols, so we would like to better understand how it would work operationally.

Finally, while stakeholders recognize the distinct roles of Network Integration Transmission Service (NITS) and Point-to-Point (PTP) service, we are increasingly concerned about the growing lack of parity between the two. BPA should consider measures to ensure equitable treatment and access across service types to maintain fairness and system integrity. At the end of the day, we are all in this together with customers needing certainty to avoid cost impacts, Load Serving Entities (LSE) needing certainty to enter long-term PPA's, developers needing certainty to obtain financing. With this in mind, please review the following questions that we would like to have more information and clarity on. We also support an additional meeting day in December to address customer concerns by scheduling a customer-led workshop immediately following the BPA workshops.

1. How does BPA incorporate PTP load forecasts into its reliability planning?

2. Does BPA forecast regarding shrinkage in its interconnection and TSR queues due to changes in federal policies? Does that shrinkage help us manage the queue? Does it change any of BPA's thinking regarding Interim Service for PTP customers?

3. Regarding Interim Service for PTP customers, what information is BPA relying on regarding the expected frequency, duration (hours) and magnitude (MWh) of redispatch due to new PTP service offers? What happens if BPA or the PTP customer needs to redispatch a non-federal resource? That is, how will NITS and PTP remain non-discriminatory if NITS customers are paying *pro forma* redispatch costs as a class but PTP customers are incurring actual redispatch costs individually? Is that "comparable" and "not unduly discriminatory"?

4. What additional tools or processes should BPA put into place to help PTP customers manage what is reasonably expected to be more frequent and longer curtailment of Interim Service? Does BPA expect to request redispatch of non-federal resources in order to manage curtailments of Interim PTP? Should the choice of resources to redispatch attempt to minimize the cost to the region of all such redispatch?

We are asking for the topics above to be considered and focused on as BPA staff prepares for the upcoming December TC-27 workshop. We are also requesting an additional day as part of the December TC-27 Workshop process for an open discussion about topics as part of the planned activities. We appreciate BPA's leadership and look forward to continued collaboration and consideration of these requests as we partner to ensure a robust and reliable transmission system is available for the region.

Sincerely,
The PTP Coalition

Signers Include:

Grant PUD

Tacoma Power