



November 12, 2025

Bonneville Power Administration
By e-mail to: techforum@bpa.gov

Re: NIPPC/RNW Comments on BPA's TC-27 Kick-Off Workshop

The Northwest & Intermountain Power Producers Coalition ("NIPPC") and Renewable Northwest ("RNW") submit the following comments in response to the TC-27 workshop on October 28, 2025 ("the Workshop").

I. BACKGROUND

NIPPC and RNW have submitted extensive comments through BPA's Grid Access Transformation ("GAT") process. BPA has indicated that many elements of BPA's proposals in the GAT process will likely be incorporated into TC-27 proposals. NIPPC and RNW continue to support the overall direction of GAT and TC-27 in accelerating expansion of the transmission grid and reforming how customers request and how BPA awards transmission service; all while ensuring that BPA's reforms continue to provide comparable and non-discriminatory open access to BPA's transmission system regardless of whether the customer chooses Point to Point or Network Transmission Service. Based on feedback from BPA staff, NIPPC and RNW will not repeat any of the earlier comments we have submitted in the GAT process; nevertheless, NIPPC and RNW continue to stand behind the substance of our previous comments regarding the support for BPA on its overall direction and also remain open to feedback from other parties as BPA refines its proposals in TC-27.

II. TIMELINE

NIPPC and RNW support the overall timeline for the TC-27 workshops. While the proposed timeline is aggressive, BPA and its stakeholders have already discussed many of the issues posed in TC-27 in the GAT process. Given the ongoing pause in processing transmission service requests, NIPPC and RNW continue to support rapid resolution of the issues in scope for TC-27.

III. SCOPE OF TC-27

NIPPC and RNW support the proposed scope of TC-27. This support is based on BPA's representations that proposals to reform BPA's planning processes and reforms that will allow BPA to accelerate its expansion of the grid (including enhanced customer build opportunities) will proceed in parallel outside of the formal TC-27 process. NIPPC and RNW appreciate that carving planning and self-build reforms out of the scope of TC-27 will allow BPA and the parties to continue to discuss those issues even after *ex parte* triggers for the formal TC-27 process. To date, however, BPA has not announced any separate stakeholder processes related planning or self-build reforms. NIPPC and RNW encourage BPA to announce the kick-off date, scope and overall timelines for those parallel processes.

IV. GENERAL COMMENTS

NIPPC and RNW appreciate the additional information BPA has provided regarding the challenges BPA faces in completing cluster studies under the current paradigm. NIPPC and RNW also appreciate the additional insights related to the problems associated with proposals to "batch" transmission service requests in smaller cluster studies. NIPPC and RNW are particularly concerned that batching would not resolve the queue processing issues BPA has articulated; rather, batching would result in inefficient plans of service that would need to be constantly modified as subsequent batch studies were completed, likely substantially delaying upgrades needed to meet the needs of customers in early batches.

V. ADDITIONAL QUESTIONS

In continuing to consider the solutions BPA proposed as part of the GAT, NIPPC and RNW have identified specific scenarios that a comprehensive TC-27 package will need to address. These scenarios assume that BPA will propose to adopt an approach to processing transmission service requests like that proposed in the GAT (i.e., BPA will immediately award interim conditional firm service to customers who submit a completed application for transmission service in anticipation of BPA being able to firm that service within 5-6 years):

- A. What options will a customer have when, after accepting an award of interim conditional firm service, BPA determines that the plan of service needed to firm the customer's service will require an incremental rate? NIPPC and RNW suggest that in this circumstance, the customer should have the option to 1.) terminate the service, 2.) elect to continue to take conditional firm service

- without a bridge to firm, or 3.) elect to continue on the path to firm at an incremental rate.
- B. The timeline BPA establishes to complete a plan of service to firm a customer's conditional firm service may not meet that customer's needs. In this situation, customers should have an ability to accelerate completion of the plan of service needed to firm their service. The solution could consist of a self-build option at the customer's cost and risk.

VI. CONCLUSION

Thank you for the opportunity to submit these comments. NIPPC and RNW appreciate BPA's continued engagement with stakeholders and look forward to collaborating further on this important initiative.