

Submitted to techforum@bpa.gov on November 12, 2025

RE: Preliminary PPC Comments on BPA's TC-27 Kick Off Workshop

The Public Power Council (PPC)¹ appreciates the opportunity to comment on the Bonneville Power Administration's (BPA) TC-27 Kick Off Workshop. As we have previously stated, PPC is supportive of BPA exploring ways to meet its customers' transmission needs in a timelier and more efficient manner. We understand that the agency sees making modifications to its tariff through the TC-27 process as the best way to move that objective forward. PPC offers the following comments in the interest of an effective TC-27 process.

BPA Needs to Proceed Efficiently and Effectively within the Current Timeline

We understand that BPA staff is working internally to develop materials for future workshops and being deliberate in completing its six-step customer engagement process; however, we are concerned that the current pace of discussions will not allow sufficient vetting of issues prior to the formal TC-27 proceeding. This is not to suggest that BPA add time to its planned schedule, as the current planning "pause" is having significant impacts to its customers and continuing to progress towards solutions on the current timeline is important. Instead, PPC would like to see BPA use the time available as efficiently and effectively as possible to explore and vet alternatives with customers.

In order to do so, PPC requests that BPA take several actions in advance of or as part of the next workshop:

- Provide additional background information that has been requested in written comments submitted by stakeholders, including PPC.
- As part of steps 3 and 4 which will be discussed at the December workshops, clearly define the objective related to each identified "problem." Additionally, the agency should identify the specific criteria that it is using to evaluate identified alternatives. This will help customers understand the tradeoffs that BPA is considering in making its recommendations.
- Commit to a specific timeframe and forum for developing the future state as conceptualized in the Grid Access Transformation (GAT) process.
- Include time for a customer led workshop immediately following the BPA led meetings in December to allow for customers to provide initial feedback and potentially test ideas for additional alternatives. For this meeting to be effective, BPA staff must be able to engage with

¹ PPC is the umbrella trade association representing the interest of the Northwest's non-profit, public power utilities that have preference rights to the output of the federal system. PPC's members rely on BPA for wholesale power and transmission services to provide economic, reliable, and environmentally responsible power supply for the communities and businesses they serve at cost. PPC's members fully subscribe the firm output of the Federal Columbia River Power System (FCRPS) and a large portion of the capability of BPA's transmission system. The ability to access BPA's transmission system to deliver federal and non-federal generation to their communities is critical for PPC members.

and respond to customer proposals and concepts – (identify if alternatives are worth exploring, has already been considered, or is off the table and explain why). This will require the right mix of subject matter expertise at the meeting as well as individuals who have the authority to offer initial thoughts on behalf of the agency.

We appreciate your consideration of these recommendations as you prepare for the next workshop.

The Current Proposed Scope Lacks an Important Commitment to Reach the Future State

PPC understands the importance of keeping future state issues out of scope for the TC-27 process so that they are not impacted by *ex parte*. We also acknowledge that there are many important details regarding the transmission planning “future state” which require much more evaluation and discussion. However, not addressing the future state at all in TC-27 provides little certainty for customers that the changes being adopted in this proceeding will eventually culminate in a future state where their needs are met more quickly by BPA through proactive planning and enhanced project execution. The TC-27 process is building a bridge to that future state, and without any commitment to the general concept or an estimated timeline, this process has the potential to be a bridge to nowhere. PPC appreciates the opportunity to brainstorm with BPA on ways that a high level commitment to reaching the future state can be included as part of TC-27, along with a draft timeline, and a potential back stop process if the agency is unable to achieve the future state as envisioned (or if stakeholders and BPA collectively determine that is no longer the best outcome).

PPC Supports BPA’s Work to Modernize Its Processes

PPC is working with BPA on several fronts to improve the transmission service it provides to its customers and can appreciate the ongoing challenges with staffing multiple initiatives. At the same time, undertaking these efforts is critical for continuing to modernize BPA’s systems and processes to meet the needs of its customers amidst a quickly changing regional energy landscape. It will be critical that the agency works across functions to ensure that all the proposals being advanced in the TC-27 and GAT processes are consistent with other key priorities such as implementing the Provider of Choice contract, preparing for binding participation in the Western Resource Adequacy Program (WRAP), and joining Markets+. A cross functional agency perspective is also necessary for understanding policy change impacts to business operations and practices and must be clearly addressed in BPA’s evaluation of alternatives.

PPC looks forward to partnering with BPA on all these fronts and appreciates the opportunity to provide these comments.

Sincerely,

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