

June 26th, 2026

BONNEVILLE POWER ADMINISTRATION
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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments concerning BPA June 15th Load Area Reinforcement Studies (LARS) Customer Meeting

Seattle City Light (City Light) appreciates Bonneville Power Administration (BPA) engagement with customers regarding BPA's LARS proposal. Please accept the following comments.

General Comments:

City Light supports BPA's efforts to improve service effectiveness and efficiency. The stated purpose of LARS—to proactively address localized reinforcement needs—should be implemented for all customers, not a small subset over an 18–24-month period. Applying LARS equitably will improve confidence in BPA's planning and reduce perceptions of preferential treatment.

City Light is concerned that both PARS and the planned LARS process could produce inequitable outcomes. For PARS, BPA devoted substantial staff and study resources without recovering costs; shifting other customers' studies to consultants—typically at three to six times BPA's internal cost—creates avoidable customer harm. If LARS recovers BPA staff costs, the approach should still ensure that other customers are not burdened with higher third-party costs due to internal resource reallocation.

Regarding staffing, City Light asks BPA to reconsider the perception created by significant transmission-staff expansion while serving a limited set of customers. Such expansion is appropriate only if benefits accrue broadly. City Light's support for future Integrated Resource Plans and budgets will be contingent on demonstrable proportional service to our ratepayers.

City Light also requests greater transparency linking BPA's GERP 1.0/2.0 project maps to actual resourcing and schedule performance. The current picture suggests a primary focus on the Portland area. Please publish resource allocation details (staffing, budget, timeline, and milestone status) by project and geography.

To anchor proactive planning in customer service, City Light recommends BPA adopt the following principles:

- Improve evaluation of customer-provided localized forecasts across BPA service areas and interconnected systems.
- Engage customers earlier and more consistently throughout the planning process.
- Initiate collaborative discussions with customers to understand localized load-growth trends.
- Increase transparency around potential future system reinforcement needs.
- Provide customers with clearer, longer-range planning insights.
- Enhance visibility into potential mutually beneficial expansion projects that span multiple customers.

LARS Area Evaluation

City Light requests BPA explain the criteria used to exclude the Puget Sound area from LARS. BPA indicated that non-selected areas either lack substantial congestion, have a robust 10-year plan, or show no challenges in LLIRs or SGI/LGIs. Which of these applies to Seattle and the greater Puget Sound region? Please provide supporting data.

Additional Localized Load Areas

City Light believes the stated purpose of the LARS initiative should be applied to BPA's entire customer area instead of a select few.

Localized Load-Growth Trends and Planning

If BPA consistently includes ≥ 100 kV facilities in its transmission planning processes—and harmonizes requirements across load forecasts, interconnection requests, and transmission service requests—localized load growth can be addressed within existing processes. BPA's recent GI improvements (site control, commercial viability, deposits) are helpful; applying similar requirements to Line & Load requests would further reduce uncertainty and improve planning discipline.

City Light also emphasizes that BPA's mission to facilitate economic growth in the Northwest does not imply that all customers should subsidize localized capacity expansions benefiting a few. Customers seeking greater available capacity—on the BPA main grid or in localized areas—should fund the associated development.

Perspectives on Customer Study Costs

If BPA proceeds with LARS, City Light requests:

- **Deposits:** Require participating entities to provide deposits of **125% of estimated study cost** for their area.
- **Accounting & True-Up:** Provide a detailed cost accounting at completion and **true-up** actuals against deposits.



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- **Residual Application:** Allow any residual funds to be applied to the entity's **ongoing Line & Load Interconnection costs**.

City Light thanks BPA for accepting and considering these comments.

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cc: Melanie Jackson, Bonneville Power Administration