

May 2, 2025

Via email:

techforum@bpa.gov

U.S. Department of Energy
Bonneville Power Administration
Transmission Services

Re: Comments of Puget Sound Energy, Inc. Regarding Transmission Planning Reform Update

Puget Sound Energy, Inc. (“PSE”) submits the following comments on the BPA April 21, 2025 presentation on Transmission Planning Reform Update.¹

PSE appreciates BPA’s efforts to reform the transmission planning and award processes to deliver service on a much quicker timeline. We agree that the current TSEP process will be unable to meet customer demands for additional transmission in a timely manner so that the region’s growing load and clean energy goals can be met.

BPA discussed potential options on how to reform the current process. We support a 5-6 year timeline from request to service and believe that BPA can achieve this goal. In principle, we support BPA’s proposal to change to an On Demand Service that will speed up the award of bridge conditional firm transmission service to customers who have an achievable commercial path to place a generating resource into service. This would be consistent with BPA’s recently adopted large generator interconnection process to prioritize projects that are commercially ready.

At this time, there were few details shared about the proposed reforms and we look forward to opportunities for additional discussions and input during future meetings. We do want to emphasize that an award of bridge conditional firm service would need to include full rollover rights. Absent full rollover rights, PSE and developers would be unwilling to risk starting construction and investing hundreds of millions of dollars in capital.

PSE appreciates BPA’s review of these comments. By return e-mail, please confirm BPA’s receipt of these comments.

cc: Adelle Harris, alharris@bpa.gov

¹ Available at <https://www.bpa.gov/-/media/Aep/transmission/atc-methodology/April-2025-Tx-Planning-Reform-Public-Workshop-Update.pdf> (“April 21 Presentation”).