



Seattle City Light

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May 2, 2025

BONNEVILLE POWER ADMINISTRATION
PO BOX 14428
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Submitted via BPA's Tech Forum (techforum@bpa.gov)

Comments Concerning April 21, 2025, BPA Transmission Planning Reform Meeting

Seattle City Light (City Light) appreciates Bonneville Power Administration (BPA) engagement with customers regarding reforming BPA's transmission planning. Please accept the following comments regarding BPA's Transmission Planning Reform.

City Light supports BPA's vision of providing firm transmission service within five to six years of the original request. As an entity that requires additional Cross Cascades North path capacity, City Light requests BPA develop a project plan to achieve this goal.

BPA should not devalue future Point-to-Point transmission service by limiting PTP rollover rights.

City Light suggests that it is in all customers' interest that BPA follow *Pro Forma* OATT policy while meeting its statutory obligations.

BPA should prepare to join a Regional Transmission Organization while meeting its statutory obligations.

BPA should use probabilistic analysis in long-term transmission planning.

BPA should use the principle of least regrets when designing and selecting transmission expansion projects. We suggest BPA consider a robust main grid designed for the needs 20 years in the future.

Seattle City Light thanks BPA for accepting and considering these comments

Michael Watkins
Strategic Advisor
Seattle City Light

cc: Melanie Jackson, Bonneville Power Administration